

**EXHIBIT A**  
**Part 2 of 2**

## 9.a. Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel - Transaction Details

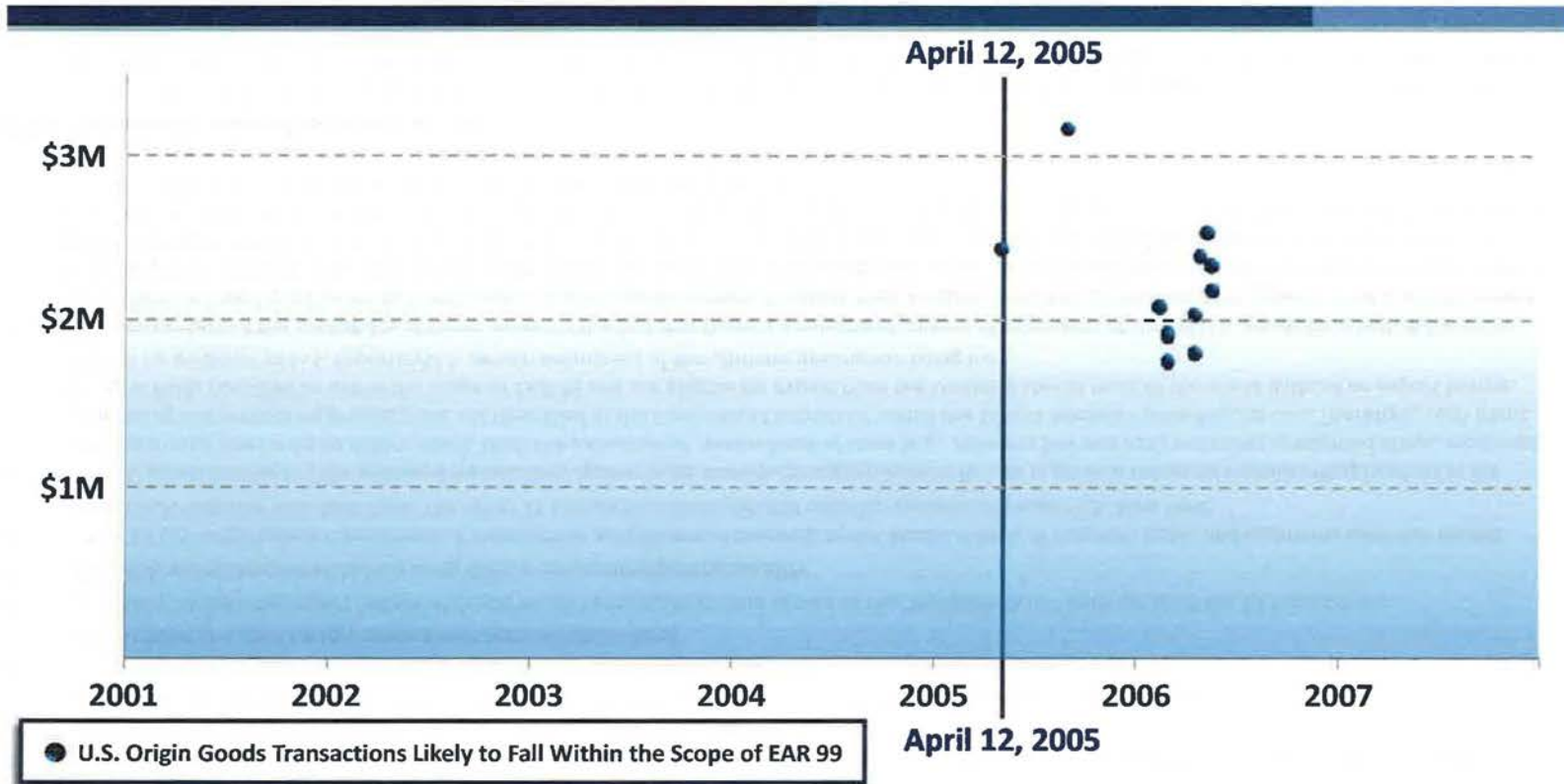
### U.S. Origin Goods Transactions Likely To Be Classified As Within The Scope Of EAR 99

- 12 transactions with a total value of \$26,773,000.
- All transactions involved the shipment of U.S. origin goods, being metal manufacturing equipment (such as bed plates and platform beams), to Iranian entities Alborz Steel, Hafta Almas Industries, and Khorram Sanat Producing Co.
- The shipping documents for the U.S. origin transactions do not indicate the name of the U.S. manufacturer of the goods.
- The three importing entities appear to be related, as Hafta Almas Industries shares an address with Alborz Steel, and Khorram Sanat is listed on the Alborz Steel website as a steel factory owned/managed by Alborz Steel.
- SCB, Dubai advised the Export Letters of Credit for all 13 transactions and served as the "Available With" bank on 12 of the 13 transactions.
- The goods were transported to Iran using IRISL, a non-contemporaneous SDN.
- Of the 13 U.S. origin goods transactions, 2 involved the assignment of proceeds to the National Bank of Fujairah, Dubai and payments were not routed through SCB, Dubai or SCB, New York. The other 11 transactions involved USD clearing payments through SCB, New York.
- The U.S. goods involved in the reviewed transactions appear to be manufacturing equipment for use in general industrial metalworking (such as in the manufacture of steel sinks by Alborz Steel). With the exception of certain kinds of steel (e.g., stainless 304 and 316) and other specialized alloys, most basic steel rolling and processing products are not described in the Commerce Control List within the Export Administration Regulations. Therefore, such items are most likely classified as within the scope of EAR 99 and are eligible for export from the United States to most of the world without an export license. There is no evidence of U.S. Exporter/U.S. person awareness of the ultimate destination being Iran.
- Evidence present of the probability of direct export is the fact that there is a consistent pattern of shipments of similar U.S. goods for a high dollar value, which differ in type from Diamonds Steel's non-U.S. origin goods exports (finished steel products), and that Diamonds Steel appears to be a wholly owned subsidiary of an Iranian entity, Alborz Steel. Additionally, the assignment of proceeds may be an indication that another bank was funding the import of the goods, making the link between the import and export of the goods closer. Evidence contrary to the probability of direct export is the fact that no U.S. entity can be identified in the transactional documents, and Diamonds Steel appears to run an established business in importing steel goods from a number of countries to UAE, and does not export goods to Iranian affiliates exclusively.

### Other Transactions Reviewed For Diamonds Steel

- 40 transactions with a total value of \$13,633,214, including 2 unconfirmed cases, potentially involving U.S. origin goods, total value \$3,103,000, for which the shipping documents cannot be found. These transactions are included in the "Transactions With Some Evidence of U.S. Origin Goods" category (Section 10.b.).
- Transactions included shipments of finished products (kitchen sinks) of Iranian origin, being shipped to Saudi Arabia, differing from the U.S. shipments of manufacturing equipment.

## 9.a. Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel - Transaction Summary

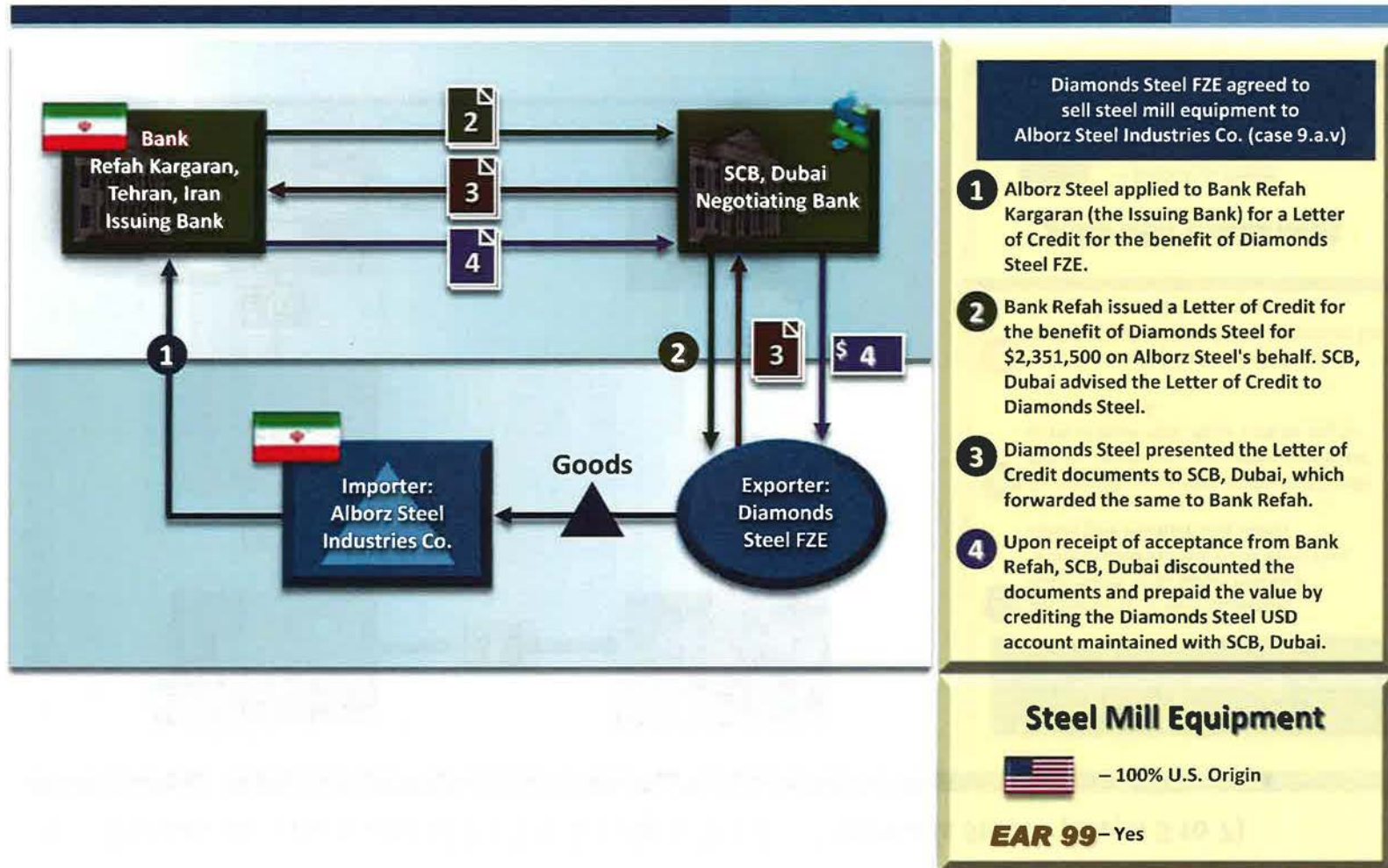


	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel	12	\$26,773,000	12	\$26,773,000

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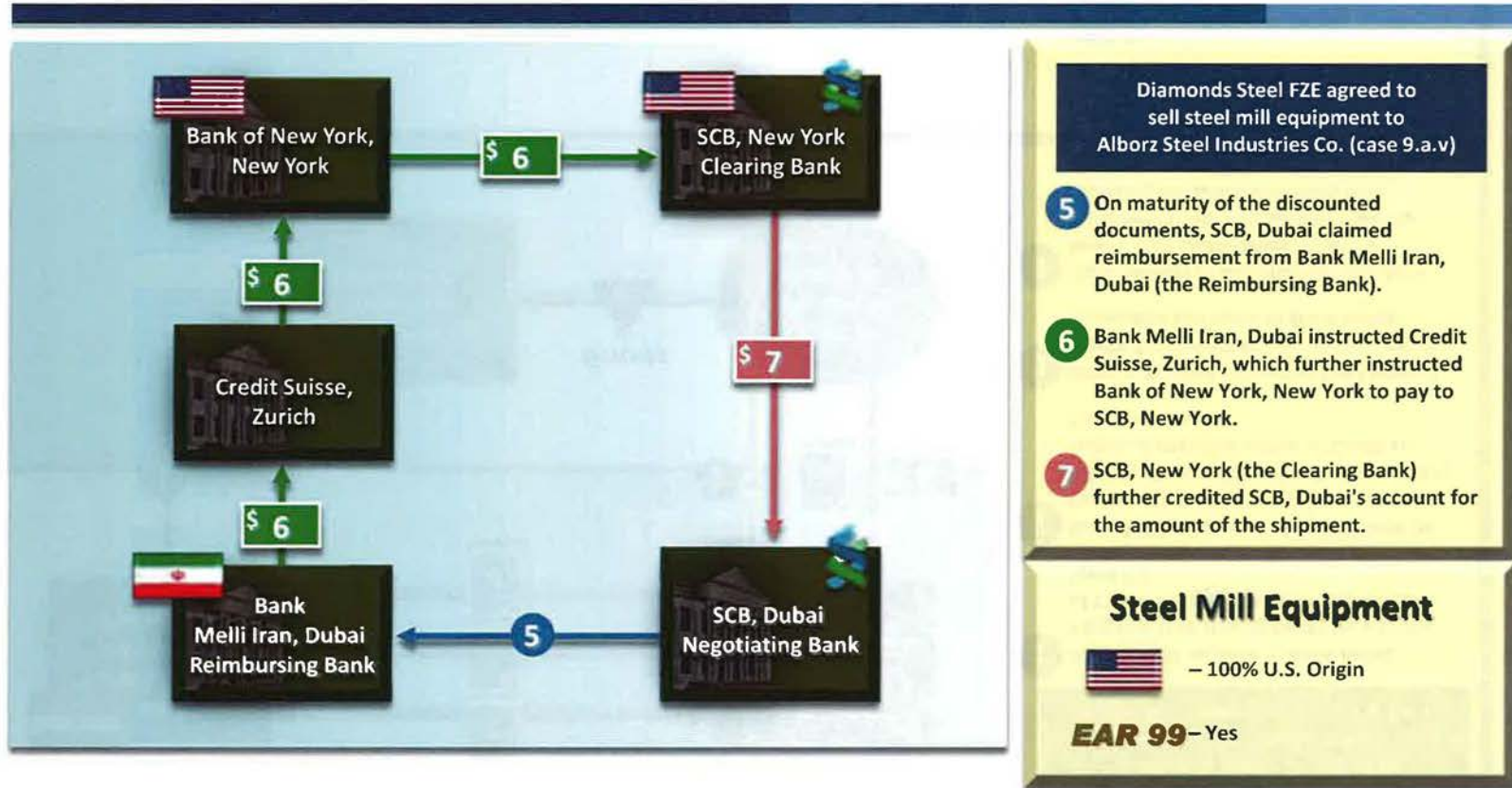
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## 9.a. Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel - (Steps 1 to 4)



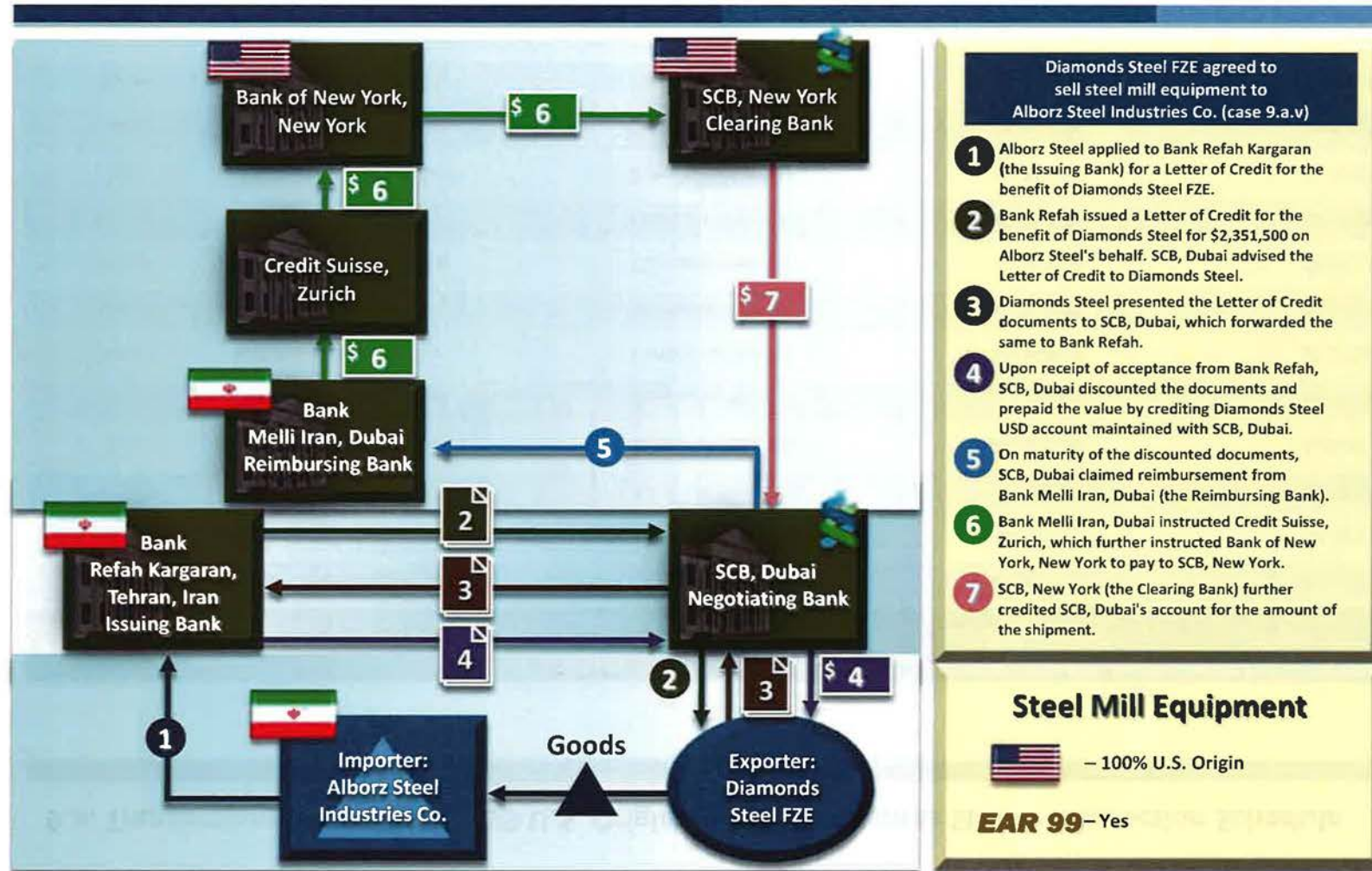


### 9.a. Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel - (Steps 5 to 7)



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## 9.a. Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel - (All Steps)





## 9.a. Transactions Involving EAR 99 U.S. Origin Goods - Diamonds Steel - Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value
9.a.i	Alborz Steel Industries Co	Diamonds Steel FZE	8/30/2005	\$3,176,500
9.a.ii	Alborz Steel Industries Co	Diamonds Steel FZE	5/10/2006	\$2,551,500
9.a.iii	Alborz Steel Industries Co	Diamonds Steel FZE	5/2/2005	\$2,451,500
9.a.iv	Alborz Steel Industries Co	Diamonds Steel FZE	4/26/2006	\$2,406,500
9.a.v	Alborz Steel Industries Co	Diamonds Steel FZE	5/17/2006	\$2,351,500
9.a.vi	Haft Almas Industries Co	Diamonds Steel FZE	5/19/2006	\$2,201,500
9.a.vii	Haft Almas Industries Co	Diamonds Steel FZE	2/13/2006	\$2,101,500
9.a.viii	Alborz Steel Industries Co	Diamonds Steel FZE	4/18/2006	\$2,051,500
9.a.ix	Haft Almas Industries Co	Diamonds Steel FZE	2/27/2006	\$1,951,500
9.a.x	Haft Almas Industries Co	Diamonds Steel FZE	2/27/2006	\$1,926,500
9.a.xi	Alborz Steel Industries Co	Diamonds Steel FZE	4/18/2006	\$1,826,500
9.a.xii	Haft Almas Industries Co	Diamonds Steel FZE	2/27/2006	\$1,776,500

**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$3,176,500
Transaction Date:	8/30/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit; Discounted Export Documents; Assignment of Proceeds
Case Reference:	9.a.i	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$3,176,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$3,176,500	Total Payments:	\$3,176,500
U.S. Persons:	Clearer: None	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Bed Plates, Pinion Stand, Foundation Bolts in Barrels and Belt Wrapper"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

1. BENEFICIARY DIAMONDS STEEL FZE P.O. BOX 17000, DUBAI FREE ZONE, DUBAI UNITED ARAB EMIRATES TEL: +971-4-3660000 FAX: +971-4-3660000	2. APPLICANT ALBORZ STEEL INDUSTRIES CO. P.O. BOX 17000, DUBAI FREE ZONE, DUBAI UNITED ARAB EMIRATES TEL: +971-4-3660000 FAX: +971-4-3660000 3. ORIGIN	4. CERTIFICATE OF ORIGIN DATE: 8/30/2005 NO: 1234567 5. COUNTRY OF ORIGIN U.S.A.
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Value:	\$2,551,500
Transaction Date:	5/10/2006

1. IMPORTER'S NAME	DATE
2. ADDRESS	
3. COUNTRY OF ORIGIN	
4. DESCRIPTION OF GOODS	
5. QUANTITY	
6. VALUE	
7. WEIGHT	
8. MEASUREMENT	
9. OTHER PARTICULARS	
10. SIGNATURE OF EXPORTER	
11. SIGNATURE OF IMPORTER	
12. SEAL	

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**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$2,451,500
Transaction Date:	5/2/2005

Program:	Iran		Product Type:	Advising Export Letter of Credit; Discounted Export Documents; Assignment of Proceeds
Case Reference:	9.a.iii		Post April 12, 2005:	Yes
Letter of Credit Amount:	\$2,451,500		Payment Status:	Confirmed
Payments for U.S. Goods:	\$2,451,500		Total Payments:	\$2,451,500
U.S. Persons:	Clearer:	None	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.		Goods Description:	"Screwdown Gear Case, Spindle, Barrels of Hardware and Tension Meter Assembly"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes		Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.			

<b>1. BENEFICIARY</b> DIAMONDS STEEL FZE P.O. BOX 17711, DUBAI, U.A.E. (DUBAI) UNITED ARAB EMIRATES TEL: 00971-4-3820077 FAX: 00971-4-3820044	<b>2. BUYER / APPLICANT</b> ALBORZ STEEL INDUSTRIES CO TEHRAN TEL: 009821-876041 FAX: 009821-876047 U.S. OF ORIGIN	<b>CERTIFICATE OF ORIGIN</b> NO. 147736 U.S. OF ORIGIN U.S.A.
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**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$2,406,500
Transaction Date:	4/26/2006

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Deferred Payment Under Export Letter of Credit; Discounted Export Documents and Risk Participation Loan
<b>Case Reference:</b>	9.a.iv	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$2,406,500	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$2,406,500	<b>Total Payments:</b>	\$2,406,500
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S. origin
<b>Description:</b>	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	<b>Goods Description:</b>	"Back Up Roll With Chuck; Tension Reel; Leveler"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	No
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	Yes	<b>Other Possible U.S. Connection:</b>	No
<b>Other Details:</b>	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

U. EXPORTER  
 DIAMONDS STEEL FZE  
 P.O. BOX 17000, JEBEL ALI FREE ZONE, DUBAI  
 UNITED ARAB EMIRATES  
 TEL.: 00971-4-8888888 FAX: 00971-4-8888888

V. APPLICANT  
 ALBORZ STEEL INDUSTRIES CO.  
 P.O. BOX 17000, JEBEL ALI FREE ZONE, DUBAI  
 UNITED ARAB EMIRATES  
 TEL.: 00971-4-8888888 FAX: 00971-4-8888888

شهادة منشأ  
 CERTIFICATE OF ORIGIN  
 NO: 118875  
 T. COUNTRY OF ORIGIN: U.S.A.

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**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$2,351,500
Transaction Date:	5/17/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment Under Export Letter of Credit; Discounted Export Documents and Risk Participation Loan
Case Reference:	9.a.v	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$2,351,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$2,351,500	Total Payments:	\$2,351,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Pinion Stand, Operator Panel; Tension Reel"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

1. BENEFICIARY DIAMONDS STEEL FZE P.O. BOX 11111, DUBAI, ALI HASSAN ROAD, DUBAI UNITED ARAB EMIRATES TEL. 04-381-1111 FAX 04-381-1111	2. EXPORTER / APPLICANT ALBORZ STEEL INDUSTRIES CO. TEHRAN TEL. 021-88888888 FAX 021-88888888 U.S. OF IRAN	3. CERTIFICATE OF ORIGIN 150000 U.S. OF ORIGIN USA
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**Applicant: Haft Almas Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$2,201,500
Transaction Date:	5/19/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment Under Export Letter of Credit; Discounted Export Documents
Case Reference:	9.a.vi	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$2,201,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$2,201,500	Total Payments:	\$2,201,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Walking Beam Trolley Coil Car; Exit Table Mill Housing; Por. No 1 motor; Tension Reel Back Side Motor"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

<b>1. BENEFICIARY</b> DIAMONDS STEEL FZE P.O. BOX 1700, ZONE 42, FREE ZONE, DUBAI UNITED ARAB EMIRATES	<b>1. المستفيد</b> DIAMONDS STEEL FZE P.O. BOX 1700, ZONE 42, FREE ZONE, DUBAI UNITED ARAB EMIRATES
<b>2. APPLICANT</b> HAFT ALMAS INDUSTRIES CO. ROOM 40, QADSIYAH TEBEELI HIGHWAY, MOHAMMADIYAH CITY, QASVIN IRL / 3566000000000000 IRL / 3566000000000000	<b>2. طالب</b> HAFT ALMAS INDUSTRIES CO. ROOM 40, QADSIYAH TEBEELI HIGHWAY, MOHAMMADIYAH CITY, QASVIN IRL / 3566000000000000 IRL / 3566000000000000

<b>شهادة منشأ</b> <b>CERTIFICATE OF ORIGIN</b> NO: 160173 1. COUNTRY OF ORIGIN: U.S.A.	DATE: 15/05/2006 رقم: 160173 1. بلد المنشأ: U.S.A.
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**Applicant: Haft Almas Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$2,101,500
Transaction Date:	2/13/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment; Discounted Export Documents; Risk Participation Loan
Case Reference:	9.a.vii	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$2,101,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$2,101,500	Total Payments:	\$2,101,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Platforms Beams and Back Up Roll with Chuck"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

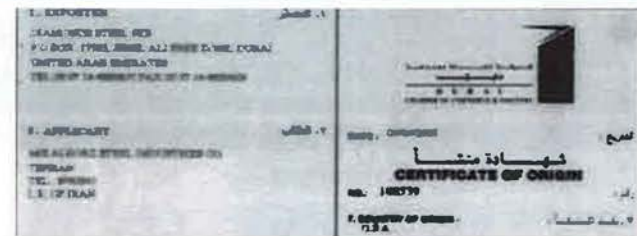
1. EXPORTER TRANSFERRED FROM YES F-1000 (1995) (2000) ALL WERE TRANSFERRED TRANSFERRED FROM YES YES, NO, PARTIAL, TRANSFERRED, YES, NO, PARTIAL	2. APPLICANT - BENEFIT TRANSFERRED FROM YES YES, NO, PARTIAL, TRANSFERRED, YES, NO, PARTIAL YES, NO, PARTIAL, TRANSFERRED, YES, NO, PARTIAL	3. CERTIFICATE OF ORIGIN YES, NO, PARTIAL, TRANSFERRED, YES, NO, PARTIAL YES, NO, PARTIAL, TRANSFERRED, YES, NO, PARTIAL
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**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$2,051,500
Transaction Date:	4/18/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment Under Export Letter of Credit; Discounted Export Documents and Risk Participation Loan
Case Reference:	9.a.viii	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$2,051,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$2,051,500	Total Payments:	\$2,051,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Platform Beams; Bed Plate (End)"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		



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Value:	\$1,951,500
Transaction Date:	2/27/2006

1. PATIENT'S NAME 2. SEX 3. DATE OF BIRTH 4. ADDRESS 5. CITY 6. STATE 7. ZIP CODE 8. PHONE NUMBER 9. HOSPITAL NAME 10. HOSPITAL ADDRESS 11. HOSPITAL CITY 12. HOSPITAL STATE 13. HOSPITAL ZIP CODE 14. HOSPITAL PHONE NUMBER 15. HOSPITAL FAX NUMBER 16. HOSPITAL E-MAIL ADDRESS 17. HOSPITAL WEBSITE 18. HOSPITAL HOURS 19. HOSPITAL SERVICES 20. HOSPITAL DEPARTMENT 21. HOSPITAL CLINIC 22. HOSPITAL UNIT 23. HOSPITAL ROOM 24. HOSPITAL BED 25. HOSPITAL CHAIR 26. HOSPITAL TABLE 27. HOSPITAL STRETCHER 28. HOSPITAL GOWN 29. HOSPITAL GLOVES 30. HOSPITAL MASK 31. HOSPITAL CAP 32. HOSPITAL SHOE 33. HOSPITAL SLIPPER 34. HOSPITAL SOCK 35. HOSPITAL SHIRT 36. HOSPITAL PANTS 37. HOSPITAL JACKET 38. HOSPITAL COAT 39. HOSPITAL DRESS 40. HOSPITAL SKIRT 41. HOSPITAL SLACKS 42. HOSPITAL TIE 43. HOSPITAL SCARF 44. HOSPITAL HAT 45. HOSPITAL Goggles 46. HOSPITAL Mask 47. HOSPITAL Cap 48. HOSPITAL Glove 49. HOSPITAL Shoe 50. HOSPITAL Slipper 51. HOSPITAL Sock 52. HOSPITAL Shirt 53. HOSPITAL Pants 54. HOSPITAL Jacket 55. HOSPITAL Coat 56. HOSPITAL Dress 57. HOSPITAL Skirt 58. HOSPITAL Slacks 59. HOSPITAL Tie 60. HOSPITAL Scarf 61. HOSPITAL Hat 62. HOSPITAL Goggles 63. HOSPITAL Mask 64. HOSPITAL Cap 65. HOSPITAL Glove 66. HOSPITAL Shoe 67. HOSPITAL Slipper 68. HOSPITAL Sock 69. HOSPITAL Shirt 70. HOSPITAL Pants 71. HOSPITAL Jacket 72. HOSPITAL Coat 73. HOSPITAL Dress 74. HOSPITAL Skirt 75. HOSPITAL Slacks 76. HOSPITAL Tie 77. HOSPITAL Scarf 78. HOSPITAL Hat 79. HOSPITAL Goggles 80. HOSPITAL Mask 81. HOSPITAL Cap 82. HOSPITAL Glove 83. HOSPITAL Shoe 84. HOSPITAL Slipper 85. HOSPITAL Sock 86. HOSPITAL Shirt 87. HOSPITAL Pants 88. HOSPITAL Jacket 89. HOSPITAL Coat 90. HOSPITAL Dress 91. HOSPITAL Skirt 92. HOSPITAL Slacks 93. HOSPITAL Tie 94. HOSPITAL Scarf 95. HOSPITAL Hat 96. HOSPITAL Goggles 97. HOSPITAL Mask 98. HOSPITAL Cap 99. HOSPITAL Glove 100. HOSPITAL Shoe 101. HOSPITAL Slipper 102. HOSPITAL Sock 103. HOSPITAL Shirt 104. HOSPITAL Pants 105. HOSPITAL Jacket 106. 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HOSPITAL Jacket 157. HOSPITAL Coat 158. HOSPITAL Dress 159. HOSPITAL Skirt 160. HOSPITAL Slacks 161. HOSPITAL Tie 162. HOSPITAL Scarf 163. HOSPITAL Hat 164. HOSPITAL Goggles 165. HOSPITAL Mask 166. HOSPITAL Cap 167. HOSPITAL Glove 168. HOSPITAL Shoe 169. HOSPITAL Slipper 170. HOSPITAL Sock 171. HOSPITAL Shirt 172. HOSPITAL Pants 173. HOSPITAL Jacket 174. HOSPITAL Coat 175. HOSPITAL Dress 176. HOSPITAL Skirt 177. HOSPITAL Slacks 178. HOSPITAL Tie 179. HOSPITAL Scarf 180. HOSPITAL Hat 181. HOSPITAL Goggles 182. HOSPITAL Mask 183. HOSPITAL Cap 184. HOSPITAL Glove 185. HOSPITAL Shoe 186. HOSPITAL Slipper 187. HOSPITAL Sock 188. HOSPITAL Shirt 189. HOSPITAL Pants 190. HOSPITAL Jacket 191. HOSPITAL Coat 192. HOSPITAL Dress 193. HOSPITAL Skirt 194. HOSPITAL Slacks 195. HOSPITAL Tie 196. HOSPITAL Scarf 197. HOSPITAL Hat 198. HOSPITAL Goggles 199. HOSPITAL Mask 200. HOSPITAL Cap 201. HOSPITAL Glove 202. HOSPITAL Shoe 203. HOSPITAL Slipper 204. HOSPITAL Sock 205. HOSPITAL Shirt 206. 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HOSPITAL Shirt 257. HOSPITAL Pants 258. HOSPITAL Jacket 259. HOSPITAL Coat 260. HOSPITAL Dress 261. HOSPITAL Skirt 262. HOSPITAL Slacks 263. HOSPITAL Tie 264. HOSPITAL Scarf 265. HOSPITAL Hat 266. HOSPITAL Goggles 267. HOSPITAL Mask 268. HOSPITAL Cap 269. HOSPITAL Glove 270. HOSPITAL Shoe 271. HOSPITAL Slipper 272. HOSPITAL Sock 273. HOSPITAL Shirt 274. HOSPITAL Pants 275. HOSPITAL Jacket 276. HOSPITAL Coat 277. HOSPITAL Dress 278. HOSPITAL Skirt 279. HOSPITAL Slacks 280. HOSPITAL Tie 281. HOSPITAL Scarf 282. HOSPITAL Hat 283. HOSPITAL Goggles 284. HOSPITAL Mask 285. HOSPITAL Cap 286. HOSPITAL Glove 287. HOSPITAL Shoe 288. HOSPITAL Slipper 289. HOSPITAL Sock 290. HOSPITAL Shirt 291. HOSPITAL Pants 292. HOSPITAL Jacket 293. HOSPITAL Coat 294. HOSPITAL Dress 295. HOSPITAL Skirt 296. HOSPITAL Slacks 297. HOSPITAL Tie 298. HOSPITAL Scarf 299. HOSPITAL Hat 300. HOSPITAL Goggles 301. HOSPITAL Mask 302. HOSPITAL Cap 303. HOSPITAL Glove 304. HOSPITAL Shoe 305. HOSPITAL Slipper 306. HOSPITAL Sock 307. HOSPITAL Shirt 308. HOSPITAL Pants 309. HOSPITAL Jacket 310. HOSPITAL Coat 311. HOSPITAL
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**Applicant: Haft Almas Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$1,926,500
Transaction Date:	2/27/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment; Discounted Export Documents; Risk Participation Loan
Case Reference:	9.a.x	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$1,926,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$1,926,500	Total Payments:	\$1,926,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Parts of Cold Rolling Mill"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

<p><b>1. EXPORTER</b></p> <p>DIAMONDS STEEL FZE          P.O. BOX 1700, JEBEL ALI FREE ZONE, DUBAI          UNITED ARAB EMIRATES          TEL: 00971 4 880077 FAX: 00971 4 880078</p> <p><b>2. IMPORTER</b></p> <p>Haft Almas Industries Co.          P.O. Box 1700, Jebel Ali Free Zone          P.O. Box 1700, Jebel Ali Free Zone          P.O. Box 1700, Jebel Ali Free Zone</p>	<p><b>3. CERTIFICATE OF ORIGIN</b></p> <p>DATE: 2/27/2006          NO: 00001          COUNTRY OF ORIGIN: U.S.A.</p>
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**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$1,826,500
Transaction Date:	4/18/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment Under Export Letter of Credit; Discounted Export Documents and Risk Participation Loan
Case Reference:	9.a.xi	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$1,826,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$1,826,500	Total Payments:	\$1,826,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Spare Back Up Roll; Bed Plate; Back Up Roll With Chuck"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		



**Applicant: Haft Almas Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$1,776,500
Transaction Date:	2/27/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment; Discounted Export Documents; Risk Participation Loan
Case Reference:	9.a.xii	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$1,776,500	Payment Status:	Confirmed
Payments for U.S. Goods:	\$1,776,500	Total Payments:	\$1,776,500
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.	Goods Description:	"Parts of Cold Rolling Mill"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	One of twelve similar transactions involving Beneficiary Diamonds Steel and U.S. origin goods shipped to an Iranian affiliate. SCB, Dubai is the "Available With" Bank.		

<b>1. EXPORTER</b> DIAMONDS STEEL FZE SUVAH 1100, SUVAH ALYASSER SUVAH, SUVAH SUVAH 1100 SUVAH TEL: 00966-11-5555555 FAX: 00966-11-5555555	<b>2. APPLICANT</b> HAFT ALMAS INDUSTRIES CO. SUVAH 1100 TEL: 00966-11-5555555 FAX: 00966-11-5555555	<b>3. CERTIFICATE OF ORIGIN</b> DATE: 2/27/2006 NO: 000000 COUNTRY OF ORIGIN: U.S.A.
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## 9.b. Transactions Involving EAR 99 U.S. Origin Goods to Mapna - Relationship Overview<sup>1</sup>

### Overview

- Bank KYC information indicates that Mapna International FZE ("Mapna"), is a UAE Private Limited Company, and the nature of business conducted is "procurement of mechanical parts and design/engineering services for thermal power stations."
- The Dun & Bradstreet listing indicates that the UAE branch of Mapna currently has 4 employees, with Mousa Refan as CEO and Hameed Zargapour as Chairman.
- Bank KYC information reviewed indicates both Mousa Refan and Hameed Zargapour are Iranian nationals. Mousa Refan is also a UAE resident.
- World Check states that Mapna, Iran, is listed on the UK Department for Business, Innovation and Skills Strategic Export Control List as a potential end user for weapons of mass destruction, as well as listed by the Canadian Government in the Special Economic Measures Act July, 2010 as a person engaged in activities contributory to Iran's proliferation-sensitive nuclear activities or development or delivery of such systems.
- Mapna was the Beneficiary of an Export Letter of Credit on all the transactions reviewed, and was therefore exporting the goods in the underlying trade. SCB, Dubai acted as the Advising Bank on these transactions, and also acted as the "Available With" bank on some transactions.

### Transaction Overview

- 280 transactions involving Mapna were identified in the Tier 1 trade data as being active from January 1, 2001 to December 31, 2007, with a total value of c.\$1,867m.
- Of those 280 transactions, 86 transactions were selected for hard copy review, with a total value \$53,043,144.
- Of those 86 transactions, 7 involved the shipment of U.S. origin goods, 5 are transactions reported in this section and 2 additional Mapna transactions, with a total value of \$563,591, are reported in Section 10.a. of this Report.

<sup>1</sup>This overview does not constitute a full report on SCB's historical business with Mapna. Facts gathered in the course of SCB's review of its business with Mapna during the Review Period will be the subject of a separate report.



## 9.b. Transactions Involving EAR 99 U.S. Origin Goods to Mapna - Transaction Details

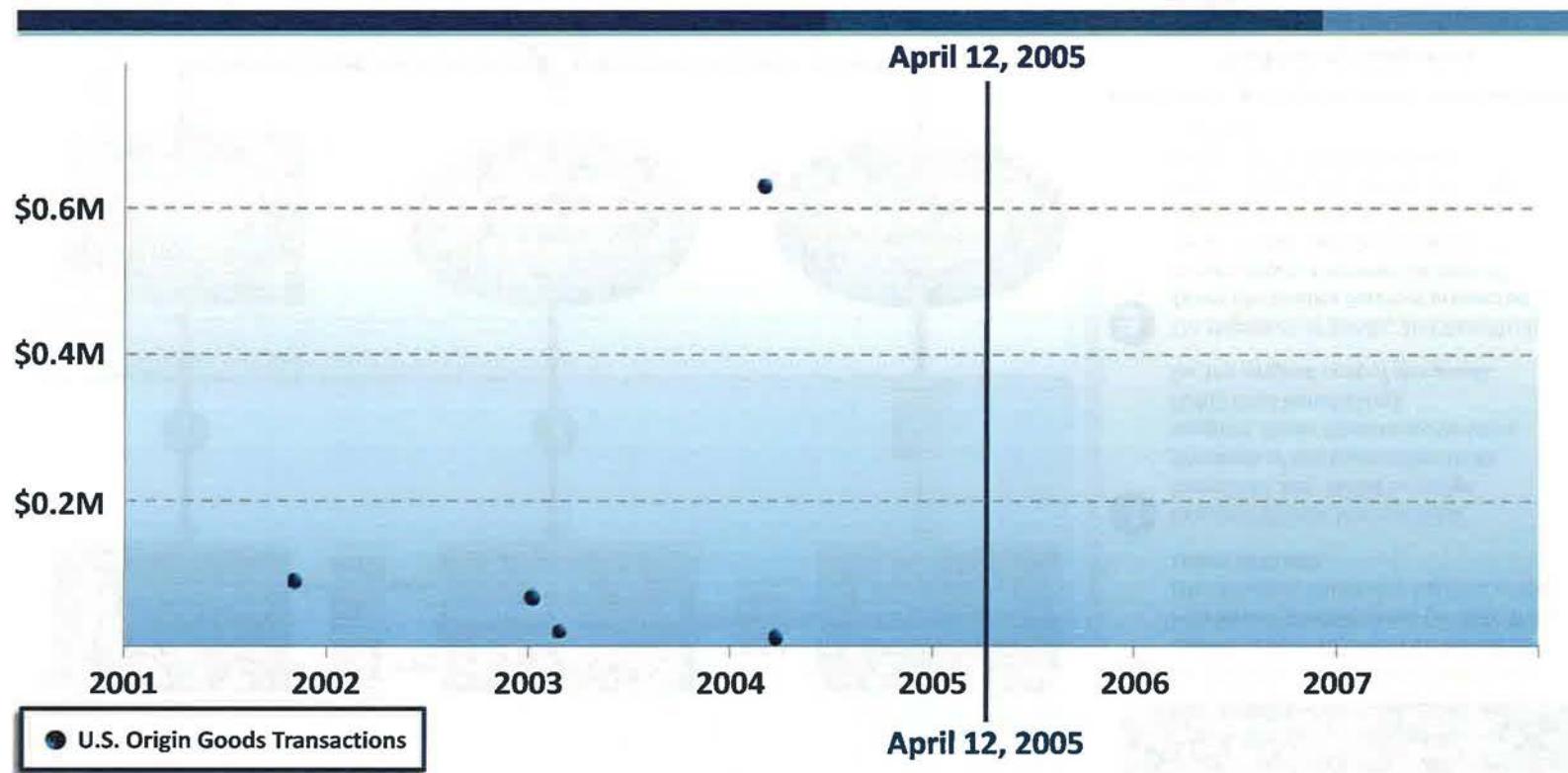
### U.S. Origin Goods Transactions Likely To Be Classified As Within The Scope Of EAR 99

- There were 5 transactions with a value attributed to U.S. origin goods of \$821,381.
- All transactions involved the shipment of goods to the Iran Power Development Company, an Iranian government-controlled entity.
- All transactions reviewed involved either back-to-back Letters of Credit (where an entity uses matching Import and Export Letters of Credit to buy and sell the same goods), or a transferable Letter of Credit (where an Export Letter of Credit is structured to allow the Beneficiary to transfer their benefit of the Letter of Credit to another entity, a second Beneficiary). The second Beneficiary (usually a UAE trading company) was the provider of the goods to Mapna. Goods were sourced from numerous countries, a small percentage of which involved negotiations under the Letters of Credit relating to U.S. origin goods.
- SCB, Dubai advised the Export Letter of Credit for all 5 transactions, and served as the "Available With" bank on 5 of the 7 transactions, and all involved clearing payments through SCB, New York. This behaviour is consistent with the other Mapna transactions where there were no U.S. origin goods.
- The goods were transported to Iran using IRISL, a non-contemporaneous SDN for 6 of the 7 transactions.
- U.S. origin goods included fire fighting equipment, fire detection equipment and parts for cooling towers, which are used in the construction of Iranian power plants. Shipping documents from U.S. manufacturers occasionally reference the specific power plant project, indicating possible knowledge that goods would ultimately be shipped to Iran. No references to nuclear power plants were found, as projects all appear to involve gas turbine plants. Therefore, such items are most likely classified as within the scope of EAR 99 and are eligible for export from the United States to most of the world without an export license.
- Evidence of the probability of direct export is the fact that some shipping documents from U.S. manufacturers reference the specific Iranian power plant project that the goods are to be used for. Further, all transactional documents reviewed involved shipments of goods to the Iran Power Development Company, indicating that Mapna exists solely as a procurement company for Iranian parties. Evidence contrary to the probability of direct export is the fact that goods are sourced by Mapna from general trading companies, and files indicate no direct contact between Mapna and U.S. manufacturers.

### Other Transactions Reviewed For Mapna

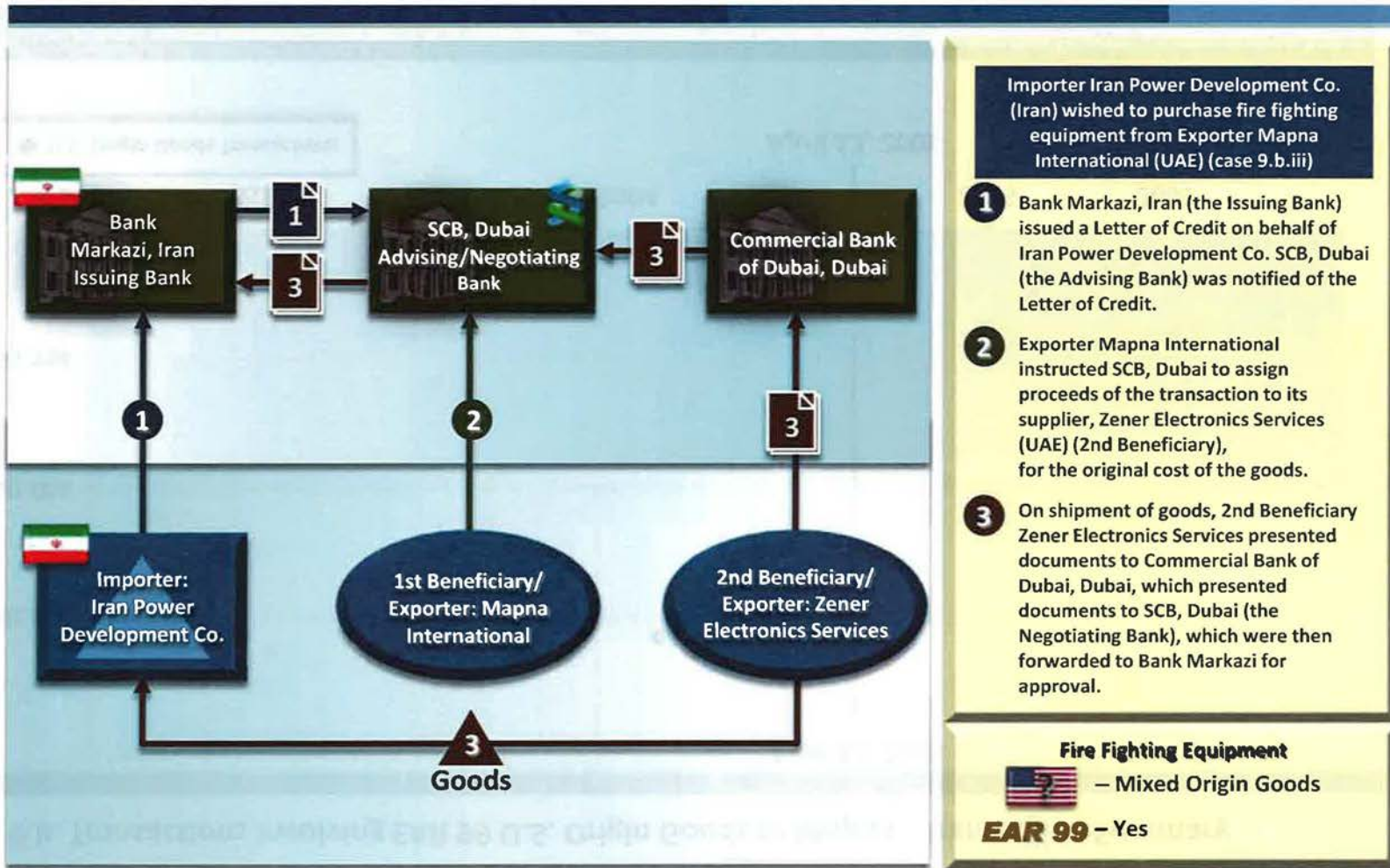
- 77 Transactions with a value of \$51,438,776, including 2 additional Mapna transactions with a total value of \$563,591 which are reported in Section 10.a. of this Report.
- Transactions included shipments of goods used in power plant construction to Iran Power Development Company. Goods were of various origins, including countries in the European Union, Japan and China.

## 9.b. Transactions Involving EAR 99 U.S. Origin Goods to Mapna - Transaction Summary



	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Involving EAR 99 U.S. Origin Goods to Mapna - Transaction Summary	5	\$821,381	0	\$0

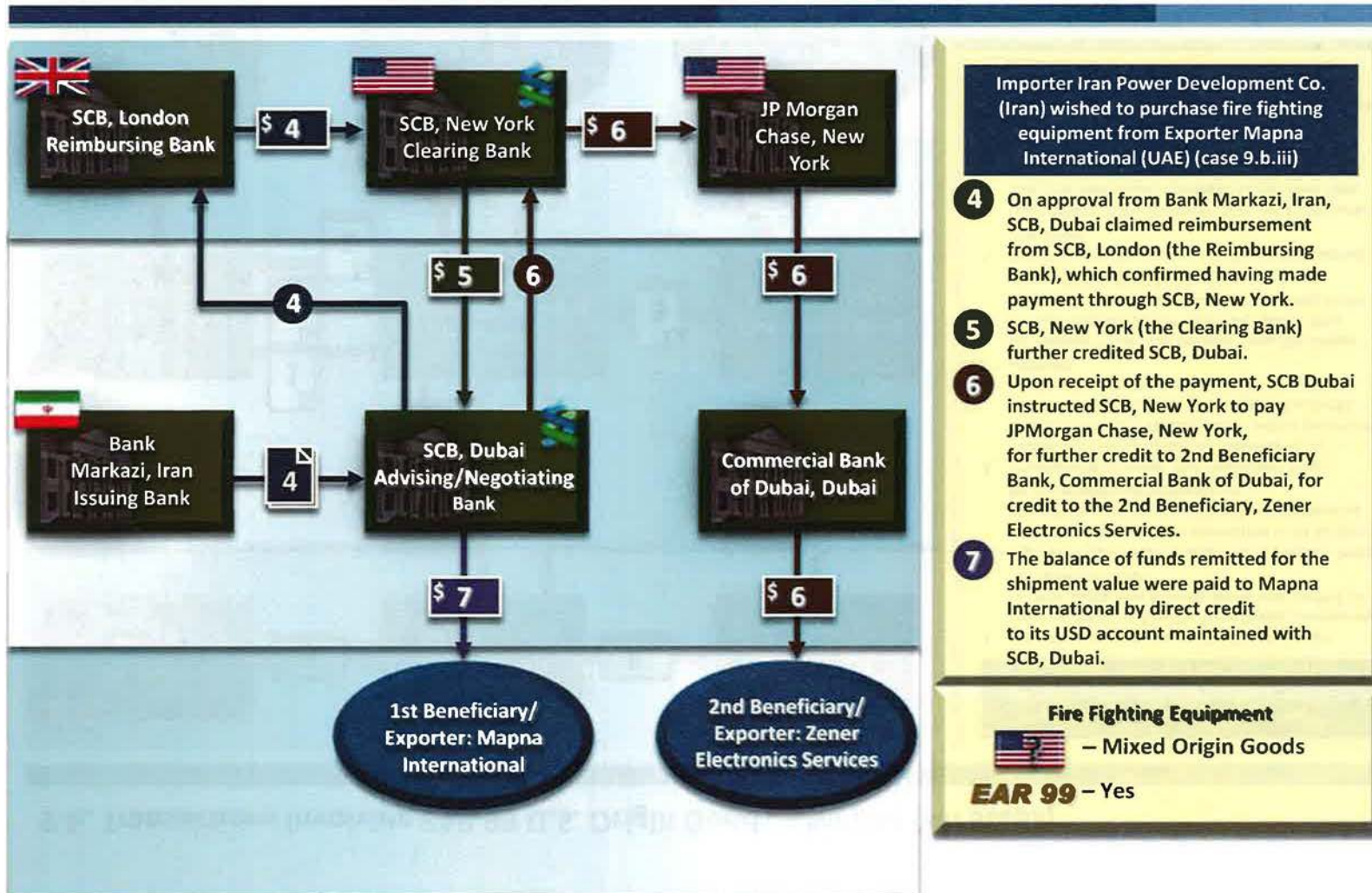
## 9.b. Transactions Involving EAR 99 U.S. Origin Goods – Mapna (Steps 1 to 3)



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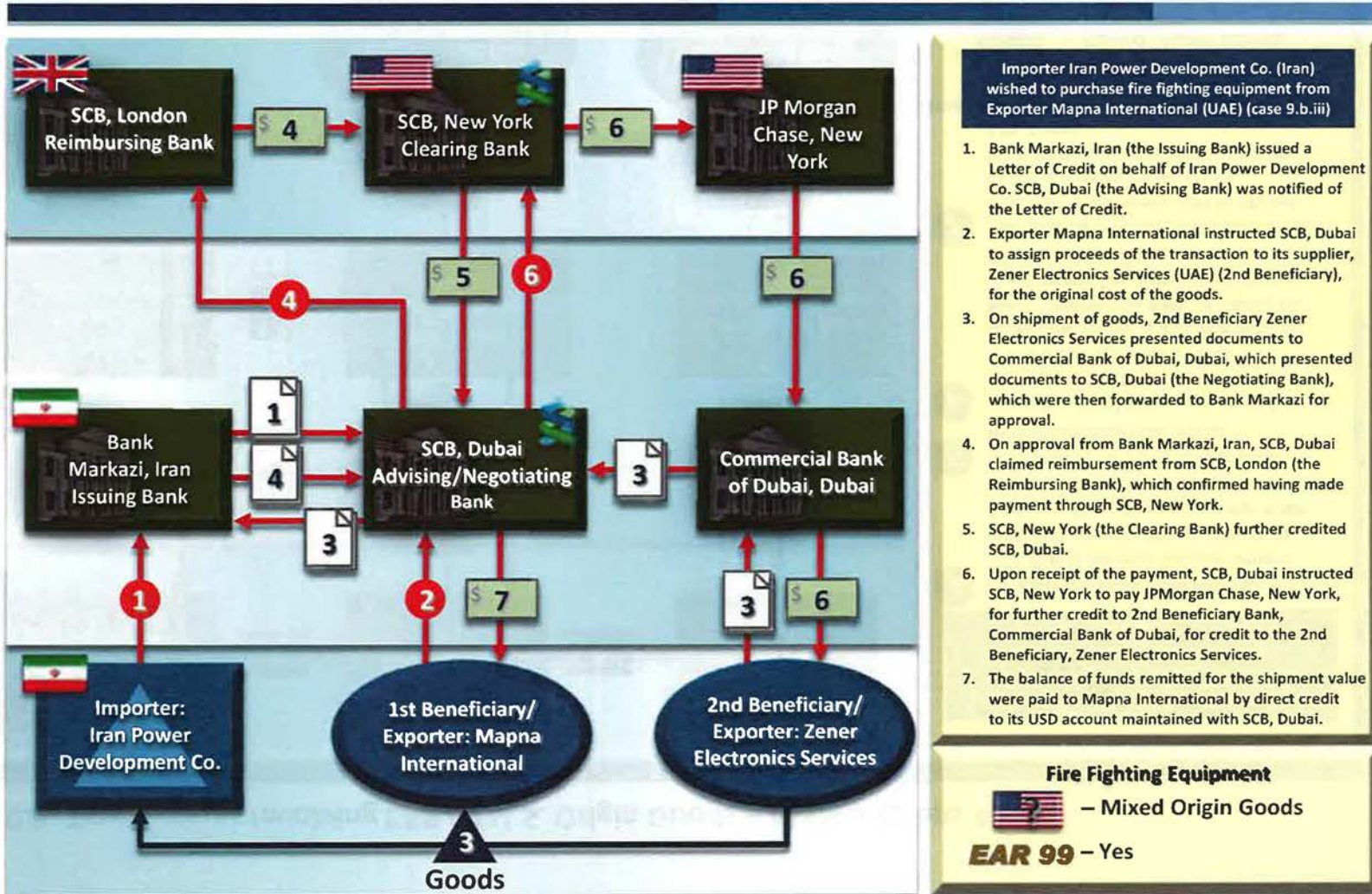


## 9.b. Transactions Involving EAR 99 U.S. Origin Goods – Mapna (Steps 4 to 7)



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## 9.b. Transactions Involving EAR 99 U.S. Origin Goods – Mapna (All Steps)



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## 9.b. Transactions Involving EAR 99 U.S. Origin Goods - Mapna - Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value
9.b.i	Iran Power Development Company	Mapna International FZE	3/2/2004	\$631,046
9.b.ii	Iran Power Development Company	Mapna International FZE	11/5/2001	\$90,000
9.b.iii	Iran Power Development Company	Mapna International FZE	1/10/2003	\$67,268
9.b.iv	Iran Power Development Company	Mapna International FZE	2/26/2003	\$21,042
9.b.v	Iran Power Development Company	Mapna International FZE	3/23/2004	\$12,025



**Applicant: Iran Power Development Company / Iran**

**1<sup>st</sup> Beneficiary: Mapna International 2<sup>nd</sup> Beneficiary: HICO FZE / UAE**

Value:	\$631,046
Transaction Date:	3/2/2004

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Deferred Payment of Transferred Proceeds Under Export Letter of Credit
<b>Case Reference:</b>	9.b.i	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$1,141,151	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$631,046 <sup>1</sup>	<b>Total Payments:</b>	\$323,688, \$111,430, \$125,787, and \$451,016
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	U.S., UK, France, Italy, Romania, Germany
<b>Description:</b>	Shipment of goods to Iranian government power development company's UAE subsidiary, who obtained the goods from a UAE energy industry equipment trader.	<b>Goods Description:</b>	"Fire and Detection and Protection System"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes (being the 2 <sup>nd</sup> Beneficiary)
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	Yes	<b>Other Possible U.S. Connection:</b>	Yes, see other details
<b>Other Details:</b>	Product Test Certificates from U.S. manufacturers Patterson and Kidde of PA indicate shipment to Iran was addressed and marked for customs. SCB, Dubai is the "Available With" Bank.		

<sup>1</sup> Being the value of the U.S. origin goods contained in the various shipments under this Letter of Credit. The remaining balance associated with the value of the non-U.S. origin goods contained in the various shipments under this Letter of Credit has been included in the value of "Transactions That Appeared to Follow U-turn Routing".



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**Applicant: Iran Power Development Company / Iran**

**1<sup>st</sup> Beneficiary: Mapna International 2<sup>nd</sup> Beneficiary: Eastern Trading / UAE**

Value:	\$90,000
Transaction Date:	11/5/2001

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment of Transferred Proceeds Under Export Letter of Credit
Case Reference:	9.b.ii	Post April 12, 2005:	No
Letter of Credit Amount:	\$90,000	Payment Status:	Confirmed
Payments for U.S. Goods:	\$90,000	Total Payments:	\$86,304 and \$3,696
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of goods to Iranian government power development company's UAE subsidiary, who obtained the goods from a UAE energy industry equipment trader.	Goods Description:	"Materials, components, semi-components, machinery and spare parts for gas turbine generators"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes (being the 2 <sup>nd</sup> Beneficiary)
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	Yes, American Energy Services, Inc.
Other Details:	A review of the commercial invoices related to shipments made under this Letter of Credit identified American Energy Services, Inc., a U.S. company, as the manufacturer of the goods involved.		

<b>1. EXPORTER</b> MAPNA INTERNATIONAL FZC P.O. BOX 81224, JEBEL ALI FREE ZONE DUBAI, U.A.E.	<b>2. CONSIGNEE</b> IRAN POWER DEVELOPMENT CO. (IPDC) NO. 131, ENKOLABEHAIR AVE., TEHRAN- IRAN
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دبی <b>DUBAI</b> CHIEF OF COMMERCE & INDUSTRY
DATE: 21 AUG 2001
<b>CERTIFICATE OF ORIGIN</b>
NO. <b>150081</b>
COUNTRY OF ORIGIN: U.S.A.



**Applicant: Iran Power Development Company / Iran**

**1<sup>st</sup> Beneficiary: Mapna International 2<sup>nd</sup> Beneficiary: Zener Electronics / UAE**

Value:	\$67,268
Transaction Date:	1/10/2003

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment of Transferred Proceeds Under Export Letter of Credit
Case Reference:	9.b.iii	Post April 12, 2005:	No
Letter of Credit Amount:	\$169,035	Payment Status:	Confirmed
Payments for U.S. Goods:	\$67,268 <sup>1</sup>	Total Payments:	\$129,595, \$16,640
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	U.S., UK and UAE
Description:	Shipment of goods to Iranian government power development company's UAE subsidiary, who obtained the goods from a UAE energy industry equipment trader.	Goods Description:	"Fire Fighting Equipment"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	Yes, see other details
Other Details:	Shipping documents indicate U.S. manufacturers Bermad, Kennedy Valve, AGF, Spectrex, ASCOA, Viking, Automatic Sprinkler and Potter. SCB, Dubai is the "Available With" Bank.		

<sup>1</sup> Being the value of the U.S. goods contained in the various shipments under this Letter of Credit.

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**Applicant: Iran Power Development Company / Iran**

**1<sup>st</sup> Beneficiary: Mapna Int. 2<sup>nd</sup> Beneficiary: Mohammed Bingham Energy / UAE**

Value:	\$21,042
Transaction Date:	2/26/2003

Program:	Iran		Product Type:	Advising Export Letter of Credit and Payment of Export Letter of Credit: Markazi refinance
Case Reference:	9.b.iv		Post April 12, 2005:	No
Letter of Credit Amount:	\$33,728		Payment Status:	Confirmed
Payments for U.S. Goods:	\$21,042 <sup>1</sup>		Total Payments:	\$40,473
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	U.S. and UK
Description:	Shipment of goods to Iranian government power development company's UAE subsidiary, who obtained the goods from a UAE energy industry equipment trader.		Goods Description:	"Instruments For Demineralized Water Transfer System"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes		Other Possible U.S. Connection:	Yes, see other details
Other Details:	U.S. manufacturers of goods listed in shipping documents as SOR Inc., Richards Industries, and Valtek.			

<sup>1</sup> Being the value of the U.S. goods contained in the various shipments under this Letter of Credit.



**Applicant: Iran Power Development Company / Iran**

**1<sup>st</sup> Beneficiary: Mapna International    2<sup>nd</sup> Beneficiary: Zener Electronics / UAE**

Value:	\$12,025
Transaction Date:	3/23/2004

Program:	Iran		Product Type:	Advising Export Letter of Credit and Deferred Payment of Transferred Proceeds Under Export Letter of Credit
Case Reference:	9.b.v		Post April 12, 2005:	No
Letter of Credit Amount:	\$67,517		Payment Status:	Confirmed
Payments for U.S. Goods:	\$12,025 <sup>1</sup>		Total Payments:	\$33,745
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	U.S. and UK
Description:	Shipment of goods to Iranian government power development company's UAE subsidiary, who obtained the goods from a UAE energy industry equipment trader.		Goods Description:	"Fire Alarm Detection System"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes		Other Possible U.S. Connection:	Yes, Kidde and Spectrex
Other Details:	Commercial invoice indicates a portion of the goods can be attributed to U.S. manufacturers Kidde and Spectrex. SCB, Dubai is the "Available With" Bank.			

<sup>1</sup> Being the value of the U.S. goods contained in the various shipments under this Letter of Credit.



## 9.c. Transactions Involving EAR 99 U.S. Origin Goods - Bakelite General Trading – Relationship Overview<sup>1</sup>

### Overview

- Dun & Bradstreet listing indicates that Bakelite General Trading LLC ("Bakelite") is a UAE Importer/Exporter with industry classifications as wholesaler of chemical products and wholesaler of industrial equipment.
- Dun & Bradstreet listing also indicates that Bakelite currently has 10 employees, with Habib Inati listed as CEO and Sayeed Aynetchi as Managing Director.
- Bank KYC information has both an Iranian and UAE passport for Sayeed Aynetchi.
- The majority of reviewed transactions involved the shipment of goods by Bakelite to an Iranian air conditioning company, Sanaye Sarmaafarin Iran Co.
- Sanaye Sarmaafarin's current website indicates a possible relationship with U.S. air conditioning manufacturer, Carrier (it includes Carrier's logo), as well as listing the company's involvement with, among others, installation projects with the Iranian Air Force, Navy and the National Iranian Oil Company.
- SCB has informed Promontory that during the Review Period, SCB, Dubai maintained accounts for Bakelite. Details regarding these accounts will be covered in a separate report on SCB's historical relationship with Bakelite.

### Transaction Overview

- 173 transactions involving Bakelite were identified in the Tier 1 trade data as being active from January 1, 2001 – December 31, 2007 with a total value of c. \$17m.
- 22 transactions were reviewed with a total value of \$2,797,709, 12 of which involved the shipment of U.S. origin goods.
  - These transactions include all Bakelite business after April 12, 2005, and include 5 transactions reviewed during the initial stages of our work and a further 17 transactions later reviewed on a judgmental basis.
  - The decision to review more Bakelite cases was made when U.S. origin goods were identified in some of the initial cases reviewed. It was decided to focus the further review work on the transactions that occurred after April 12, 2005, which we understand is the date to which the statute of limitations runs for the purposes of consideration by OFAC, per agreement between OFAC and SCB.

<sup>1</sup>This overview does not constitute a full report on SCB's historical business with Bakelite. Facts gathered in the course of SCB's review of its business with Bakelite during the Review Period will be the subject of a separate report.



## 9.c. Transactions Involving EAR 99 U.S. Origin Goods - Bakelite General Trading – Transaction Details

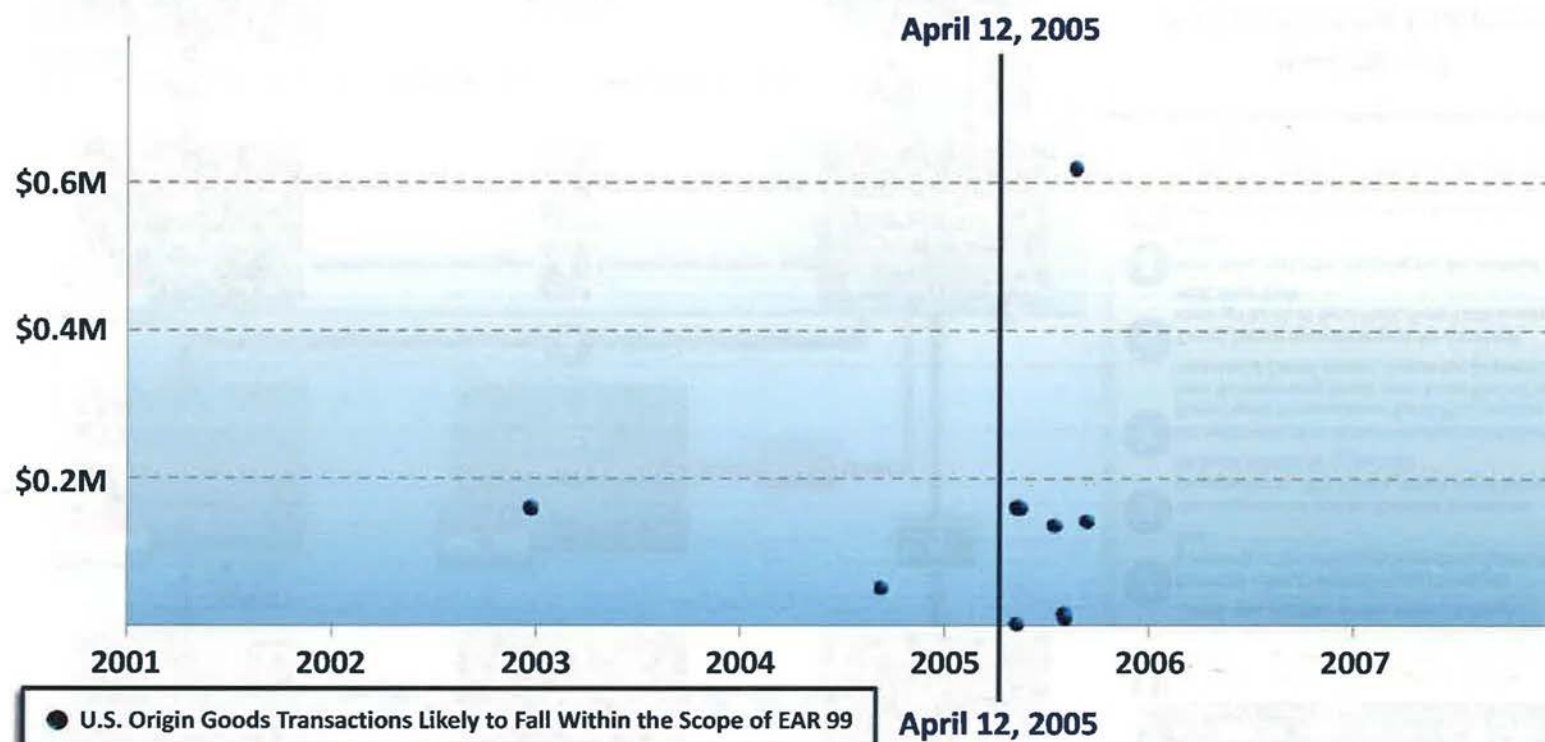
### U.S. Origin Goods Transactions Likely To Be Classified As Within The Scope Of EAR 99

- There were 12 transactions with a total value of \$1,635,637.
- 11 of the 12 transactions involved the shipment of air conditioning spare parts such as compressors and valves, to Iranian air conditioning company Sanaye Sarmaafarin Co.
- One transaction involves the purchase of goods by Bakelite from Carrier Middle East, a foreign-incorporated subsidiary of Carrier U.S.
- 10 of the 12 transactions involving U.S. origin goods shipped and received by Bakelite contained packing lists and commercial invoices indicating that goods were manufactured by Carrier U.S., or had parts numbers that, upon research, revealed likely manufacture by Carrier U.S.
- SCB, Dubai advised the Export Letters of Credit and served as the "Available With" bank for all 12 transactions.
- The 11 transactions involving shipments to Sanaye Sarmaafarin Co. all involved USD clearing payments through SCB, New York.
- Proceeds from 8 of the shipments by Bakelite to Sanaye Sarmaafarin Co. were assigned to Iranian bank, Bank Saderat.
- The goods involved in the reviewed transactions (air conditioning systems for buildings) are not described in the Commerce Control List within the Export Administration Regulations. Therefore, such items are most likely classified EAR 99 and are eligible for export from the United States to most of the world without an export license.
- Evidence for the probability of direct export is a transaction involving Bakelite purchasing goods from Carrier Middle East (a foreign subsidiary of Carrier U.S.) during the same time period that shipments of similar goods by Bakelite to an Iranian entity took place. In addition, the assignment of proceeds may be an indication that another bank was funding the import of the goods, making the link between the import and export of the goods closer. Evidence contrary to a probability of direct export is the fact that no one-to-one relationship was identified between shipments to Bakelite by Carrier Middle East and shipments by Bakelite to Sanaye Sarmaafarin. There is no indication in the transactions reviewed of knowledge by Carrier U.S. of shipments to Iran.

### Other Transactions Reviewed For Bakelite

- 9 transactions with a total value of \$1,153,026, consisting of 1 additional Bakelite transaction with a total value of \$5,185, which is reported in Section 10.b. of this Report, and 8 additional Bakelite transactions with a total value of \$1,147,841 that involved air conditioner parts and chemical products of Spanish, German, Dutch, Chinese, French and Italian origin shipped to entities in Iran, UAE and Saudi Arabia. Of these 8 transactions, 6 are reported as transactions that appeared to follow U-Turn Routing in Section 6 and two are reported as Transactions With No U.S. Nexus in Section 7.

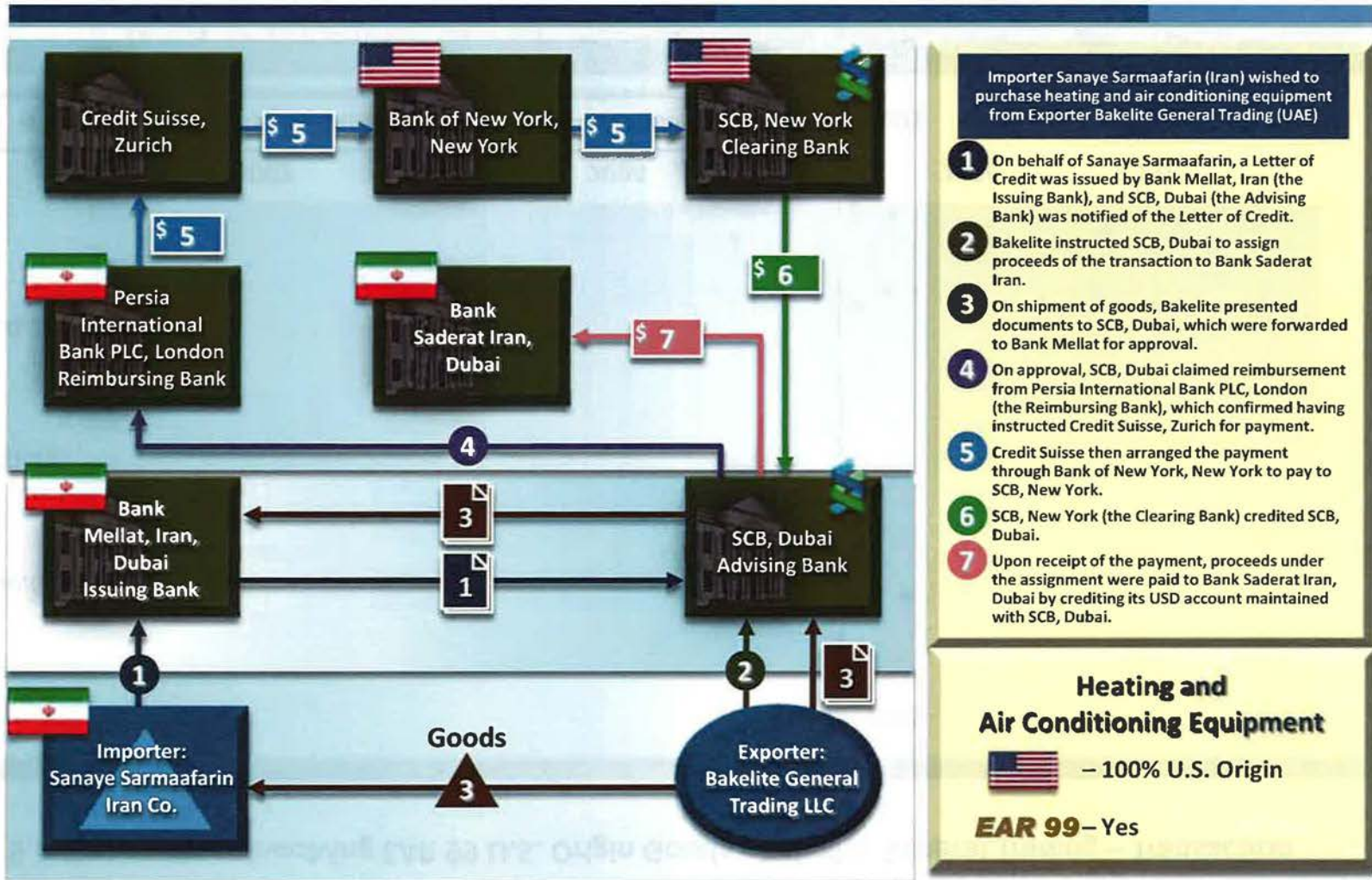
### 9.c. Transactions Involving EAR 99 U.S. Origin Goods - Bakelite General Trading – Transaction Summary



	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Involving EAR 99 U.S. Origin Goods - Bakelite General Trading	12	\$1,635,637	9	\$1,263,579



### 9.c. Transactions Involving EAR 99 U.S. Origin Goods - Bakelite General Trading



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### 9.c. Transactions Involving EAR 99 U.S. Origin Goods - Bakelite General Trading – Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value
9.c.i	Bakelite General Trading	Carrier Middle East Limited	8/24/2005	\$619,709
9. c.ii	Sanaye Sarmaafarin Iran	Bakelite General Trading	12/24/2002	\$160,030
9. c.iii	Sanaye Sarmaafarin Iran	Bakelite General Trading	12/24/2002	\$160,030
9. c.iv	Sanaye Sarmaafarin Iran	Bakelite General Trading	5/18/2005	\$159,865
9. c.v	Sanaye Sarmaafarin Iran	Bakelite General Trading	5/11/2005	\$159,865
9. c.vi	Sanaye Sarmaafarin Iran	Bakelite General Trading	9/14/2005	\$142,571
9. c.vii	Sanaye Sarmaafarin Iran	Bakelite General Trading	7/18/2005	\$136,699
9. c.viii	Sanaye Sarmaafarin Iran	Bakelite General Trading	9/10/2004	\$51,998
9. c.ix	Sanaye Sarmaafarin Iran	Bakelite General Trading	8/4/2005	\$16,611
9. c.x	Sanaye Sarmaafarin Iran	Bakelite General Trading	8/5/2005	\$16,522
9. c.xi	Sanaye Sarmaafarin Iran	Bakelite General Trading	8/5/2005	\$9,998
9. c.xii	Sanaye Sarmaafarin Iran	Bakelite General Trading	5/12/2005	\$1,740

**Applicant: Bakelite General Trading LLC / UAE**  
**Beneficiary: Carrier Middle East Limited / UAE**

Value:	\$619,709
Transaction Date:	8/24/2005

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Payment Under Export Letter of Credit: SCB, Dubai – "Available With" Bank
<b>Case Reference:</b>	9.c.i	<b>Post April 12, 2005:</b>	Yes – 4 payments totaling \$493,339
<b>Letter of Credit Amount:</b>	\$589,338	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$619,709 <sup>1</sup>	<b>Total Payments:</b>	5 Payments for \$619,709
<b>U.S. Persons:</b>	<b>Clearer:</b> None	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin goods from a UAE subsidiary of a U.S. air conditioning company to a general trader in the UAE.	<b>Goods Description:</b>	"Air Conditioning Spare Parts"
<b>EAR 99 Item:</b>	Yes (parts for air conditioning systems)	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes; see other details
<b>Other Details:</b>	A review of the shipping documents related to this transaction revealed that the goods involved were manufactured by Carrier Corp., a U.S. entity. Other transactions involved the export of similar goods to Iran.		

<sup>1</sup> It is unclear from the data reviewed why the payments made under this Letter of Credit exceeded the Letter of Credit amount.



**CONFIDENTIAL**



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$160,030
Transaction Date:	12/24/2002

Program:	Iran		Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit: SCB, Dubai – "Available With" Bank
Case Reference:	9.c.ii		Post April 12, 2005:	No
Letter of Credit Amount:	\$160,030		Payment Status:	Confirmed
Payments for U.S. Goods:	\$160,030		Total Payments:	\$160,030
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.		Goods Description:	"Compressor and Spare Parts"
EAR 99 Item:	Yes (parts for air conditioning systems)		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No		Other Possible U.S. Connection:	Yes; see other details
Other Details:	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.			

**ORIGINAL** نسخة الأصلية

1. EXPORTER  
 BAKELITE GENERAL TRADING (J.L.C)  
 P.O BOX 1438, DUBAI  
 UNITED ARAB EMIRATES  
 SUITE 501 AL DAMA CENTER AL MARIYAH STREET TEL  
 04 38007 FAX 04 38004

2. CONSIGNEE  
 SANAYE SARMAAFARIN IRAN CO  
 HQ 295, SHIRAZABAD, AVE  
 TEHRAN  
 TEL 00981 261 40000  
 1 & 2F 24M

3. CERTIFICATE OF ORIGIN  
 DUBAI  
 ISSUED BY CHAMBER & INDUSTRY  
 DATE: 12/24/2002  
 NO: 367136  
 U.S. DEPARTMENT OF COMMERCE  
 U.S.A.



Value:	\$160,030
Transaction Date:	12/24/2002

<b>ORIGINAL</b> <span style="float: right;">أصل</span>	
<b>1. EXPORTER</b> BAKHTIY BISHAL AL THALITHI C.I.C P.O. BOX 1008, PERAK UNITED ARAB EMIRATES BOX 701, AL DARGA, CENTER AL SHAMATON STREET P.O. BOX 100007, P.O. BOX 100000	<div style="text-align: center;">   <b>DUBAI</b>          EMIRATE OF COMMERCE &amp; INDUSTRY       </div>
<b>2. IMPORTER</b> BAKHTIY BISHAL BISHAL SHAR DG P.O. BOX 100000, DUBAI TEL: 04 300000 FAX 04 300000 U.A.E. DUBAI	<b>3. CERTIFICATE OF ORIGIN</b> NO. 267715 - ISSUED BY OFFICE U.A.E.

**CONFIDENTIAL**

**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$159,865
Transaction Date:	5/18/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit : Assignment of Proceeds
Case Reference:	9.c.iv	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$160,030	Payment Status:	Confirmed
Payments for U.S. Goods:	\$159,865	Total Payments:	\$159,865
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	Goods Description:	"Semi Hermetic Compressor and Spare Parts"
EAR 99 Item:	Yes (parts for air conditioning systems)	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes; see other details
Other Details:	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.		

<b>1. EXPORTER</b> BAKELITE GENERAL TRADING (S.L.C.) P.O. BOX 14002 DUBAI UNITED ARAB EMIRATES TEL: AL DHAIR CENTER AL MANJOURI TEL: +971 (0) 4 3800000 CREDIT FAX: +971 (0) 4 3800000	<b>2. APPLICANT</b> SANAYE SARMAAFARIN IRAN CO. NO. 301, W. KHEIRABADH AVE. TIRAN TEL: 00984 FAX: 00984 I.R. OF IRAN	<b>3. CERTIFICATE OF ORIGIN</b> NO. 100074 U.S.A.
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**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$159,865
Transaction Date:	5/11/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit : Assignment of Proceeds
Case Reference:	9.c.v	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$160,030	Payment Status:	Confirmed
Payments for U.S. Goods:	\$159,865	Total Payments:	\$159,865
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	Goods Description:	"Semi Hermetic Compressor and Spare Parts"
EAR 99 Item:	Yes (parts for air conditioning systems)	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes; see other details
Other Details:	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.		

<b>1. SHIPPER</b> BAKELITE GENERAL TRADING (LLC) P.O. BOX 14781 DUBAI DUBAI ABU DHABI EMIRATES U.A.E. TEL: 04 381 1111 FAX: 04 381 1111	<b>2. APPLICANT</b> SANAYE SARMAAFARIN (IRAN CO.) NO. 10, W. K. ROAD AMERGAH ATEL TEHRAN TEL: 021 8888 8888 FAX: 021 8888 8888	<b>3. CERTIFICATE OF ORIGIN</b> DATE: 06/04/2005 NO: 106070 U.S. ORIGIN OF GOODS
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**CONFIDENTIAL**



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$142,571
Transaction Date:	9/14/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit: Assignment of Proceeds
Case Reference:	9.c.vi	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$144,736	Payment Status:	Confirmed
Payments for U.S. Goods:	\$142,571	Total Payments:	3 Payments totaling \$142,571
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	Goods Description:	"Semi Hermetic Compressors"
EAR 99 Item:	Yes (parts for air conditioning systems)	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes; see other details
Other Details:	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.		

<b>1. EXPORTER</b> BAKELITE GENERAL TRADING (L.L.C.) P.O. BOX 4128, DUBAI UNITED ARAB EMIRATES TEL. 04 384 1200 FAX 04 384 1201	<b>2. APPLICANT</b> SANAYE SARMAAFARIN IRAN CO. 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000
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Value:	\$136,699
Transaction Date:	7/18/2005

<p>1. <b>SHIPPER</b></p> <p>BANQUE GENERALE TRADING S.L.L.C</p> <p>P.O. BOX 4418, KENYA</p> <p>UNITED ARAB EMIRATES</p> <p>MIL AL DANA (DUBAI) A. MAILROOM TEL: 4971 4971</p> <p>CREDIT FAX: 4971 4971 (U. ARAB)</p>	<p>1. <b> consignee</b></p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p>
<p>2. <b>APPLICANT</b></p> <p>BANQUE SAUDIYAH SAHARA DESO CO</p> <p>PO. BOX 10, KENYASAMBAH AVE.</p> <p>TEL: 498888 FAX: 498888</p> <p>U. A. OF EMIR</p>	<p>2. <b> consignee</b></p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p>
<p>3. <b>APPLICANT</b></p> <p>BANQUE SAUDIYAH SAHARA DESO CO</p> <p>PO. BOX 10, KENYASAMBAH AVE.</p> <p>TEL: 498888 FAX: 498888</p> <p>U. A. OF EMIR</p>	<p>3. <b> consignee</b></p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p>
<p>4. <b>APPLICANT</b></p> <p>BANQUE SAUDIYAH SAHARA DESO CO</p> <p>PO. BOX 10, KENYASAMBAH AVE.</p> <p>TEL: 498888 FAX: 498888</p> <p>U. A. OF EMIR</p>	<p>4. <b> consignee</b></p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p> <p>بنك العمالة العامة للتجارة</p>

**CONFIDENTIAL**



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$51,998
Transaction Date:	9/10/2004

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Payment Under Export Letter of Credit: SCB, Dubai – "Available With" Bank
<b>Case Reference:</b>	9.c.viii	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$51,998	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$51,998	<b>Total Payments:</b>	\$51,998
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	<b>Goods Description:</b>	"1,730 PCS Spare Parts for 06D and 06E Compressor"
<b>EAR 99 Item:</b>	Yes (parts for air conditioning systems)	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes; see other details
<b>Other Details:</b>	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity.		

**ORIGINAL** النسخة الأصلية

1. SHIPPER  
 BAKELITE GENERAL TRADING (S.L.C.)  
 P.O. BOX 14125, DUBAI  
 UNITED ARAB EMIRATES  
 SUITE 301, AL DAMA CENTER AL MAKTUM ST. TEL.  
 +971 42282677 FAX: +971 42286488

2. APPLICANT  
 SANAYE SARMAAFARIN IRAN CO  
 NO 208, WEST KHOMEINIAH AVE  
 TEHRAN  
 TEL: 878046 FAX: 878011  
 I.R. OF IRAN

DATE: 25/09/2004

**CERTIFICATE OF ORIGIN**

no: 244592

\* COUNTRY OF ORIGIN: U.S.A.



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$16,611
Transaction Date:	8/4/2005

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Payment Under Export Letter of Credit: Assignment of Proceeds
<b>Case Reference:</b>	9.c.ix	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$16,611	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$16,611	<b>Total Payments:</b>	\$16,611
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	None in File: Letter of Credit and Commercial Invoice indicate U.S.
<b>Description:</b>	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	<b>Goods Description:</b>	"Expansion Valve, Nozzle, Relief Valve, Check Valve, Liquid Valve"
<b>EAR 99 Item:</b>	Yes (parts for air conditioning systems)	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes; see other details
<b>Other Details:</b>	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.		

As per P/I No.SSI/PI/2K4/011 DD:040418 on CPT Basis  
Packing : Export Standard Packing  
Shipment: By Air to Mehrabad Airport Tehran I.R. of Iran  
Country of Origin: U.S.A  
Insurance effected by Iran Insurance Co.in Iran under Insurance  
Policy No.4/0284/19908-9999/015020/1383  
Custom Tariff No.8481/1090 and CB No.18666665  
Credit No.68072/8320029/9

We hereby declare that the prices stated are current export market prices for the merchandise described therein.

**CONFIDENTIAL**

**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$16,522
Transaction Date:	8/5/2005

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Payment Under Export Letter of Credit: Assignment of Proceeds
<b>Case Reference:</b>	9.c.x	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$17,050	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$16,522	<b>Total Payments:</b>	Two payments: \$6,311.92, \$10,210
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	<b>Goods Description:</b>	"Gauge Suction and Gauge Discharge, Indicator"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes; see other details
<b>Other Details:</b>	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.		

**1. SUPPLIER**  
 BAKELITE GENERAL TRADING (LLC)  
 P.O. BOX 1475, DUBAI  
 UNITED ARAB EMIRATES  
 P.O. AL. HAKA CENTER AL. HAKA TOWER ST. P.O. BOX 1971 (D)  
 DUBAI

**2. APPLICANT**  
 SANAYE SARMAAFARIN IRAN CO.,  
 140 2ND ST. KASHAN (AFADAN) AVE,  
 P.O. BOX 1000-1000 TEBERAN 13200  
 KASHAN 34000  
 I.R. OF IRAN

**1. كاشف**

**2. طالب**

**3. تاريخ**

DATE: 7/20/2005

**شهادة منشأ**  
**CERTIFICATE OF ORIGIN**

NO: 31236

COUNTRY OF ORIGIN:  
 U.S.A.



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$9,998
Transaction Date:	8/5/2005

<b>Program:</b>	Iran	<b>Product Type:</b>	Transferred Export Letter of Credit and Deferred Payment Under Export Letter of Credit
<b>Case Reference:</b>	9.c.xi	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$10,500	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$9,998	<b>Total Payments:</b>	Two payments: \$988 and \$9,010
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	<b>Goods Description:</b>	Safety Control Valves
<b>EAR 99 Item:</b>	Yes (parts for air conditioning systems)	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes; see other details
<b>Other Details:</b>	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign incorporated subsidiary of Carrier Corp., a U.S. entity. "Available With" Bank: SCB, Dubai.		

**ORIGINAL** النسخة الأصلية

**1. ISSUING** **إصدار**  
 BAKELITE GENERAL TRADING (U.A.E.)  
 P.O. BOX 19328 DUBAI  
 UNITED ARAB EMIRATES  
 TEL AL DAKA CENTER AL MARKAT 04 37 1471 4  
 DUBAI

**2. APPLICANT** **الطالب**  
 SANAYE SARMAAFARIN (IRAN CO.)  
 NO 381 W. 100/10000000 AVE.  
 P.O. BOX 1905 1407  
 TEHRAN - 1905  
 I.R. OF IRAN  
 FAX: 00022

**DATE** 13/04/2005 **التاريخ**  
**CERTIFICATE OF ORIGIN**  
 NO. 196733  
**COUNTRY OF ORIGIN** U.S.A. **بلد المنشأ**

**CONFIDENTIAL**



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$1,740
Transaction Date:	5/12/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit: Assignment of Proceeds
Case Reference:	9.c.xii	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$1,740	Payment Status:	Confirmed
Payments for U.S. Goods:	\$1,740	Total Payments:	\$1,740
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	Goods Description:	"Bearing"
EAR 99 Item:	Yes (parts for air conditioning systems)	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes; see other details
Other Details:	Other transactions involve similar exports, and one import of similar goods by Bakelite General Trading from Carrier Middle East, a foreign-incorporated subsidiary of Carrier Corp., a U.S. entity. SCB, Dubai is the "Available With" Bank.		

<b>1. SHIPPER</b> BAKELITE GENERAL TRADING (L.L.C) P.O. BOX 1422, DUBAI UNITED ARAB EMIRATES FOR A.E. (USA) "DOKTER AL. MARYOUM ST. TEL. +971 (0) 1234567 FAX: +971 (0) 234567	١. مُرْسِل شركة البكليت للتجارة العامة (ل.م.م) صندوق ب. ١٤٢٢، دبي الإمارات العربية المتحدة ل.م.م (الولايات المتحدة) "دكتور أ. ماريوم ست. تيل. +٩٧١ (٠) ١٢٣٤٥٦٧ فاكس: +٩٧١ (٠) ٢٣٤٥٦٧
<b>2. APPLICANT</b> SANAYE SARMAAFARIN IRAN CO. NO. 35, W. KHEIRABADHANE AVE. TEHRAN TEL. 02888 FAX 02888 I.R. OF IRAN	٢. مُتَقَدِّم شركة صنایه سارماافارین ایران (ش.م.س) رقم ٣٥، شارع الخیرآبادخانه طهران تيل. ٠٢٨٨٨ فاكس ٠٢٨٨٨ إيران
<b>3. CERTIFICATE OF ORIGIN</b> NO. 131777 DATE: 5/12/2005 ISSUED BY: [Signature] OFFICIAL SEAL: [Stamp]	

## 9.d. Transactions Involving EAR 99 U.S. Origin Goods - Other Goods - Relationship Overview

### Overview

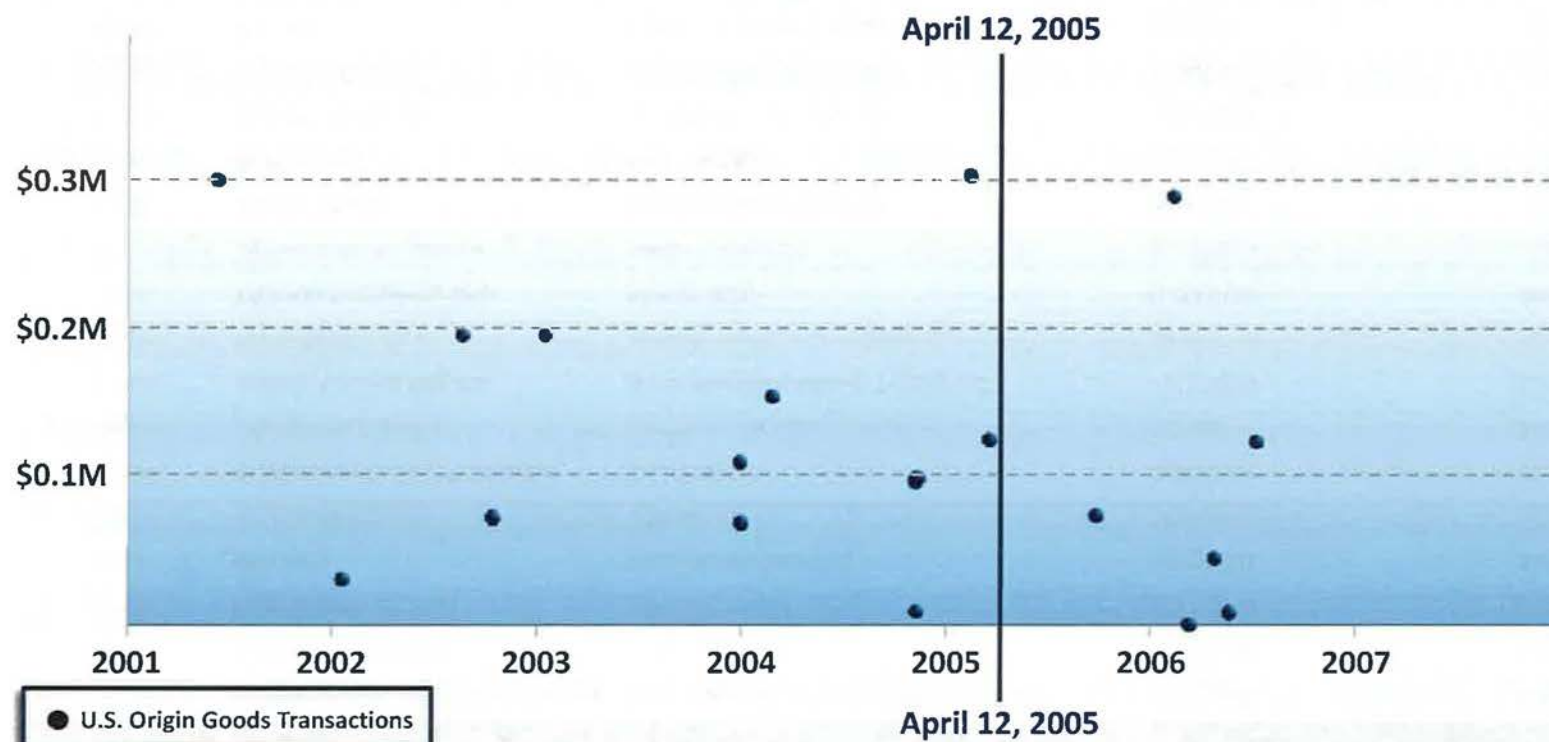
- This category includes all other U.S. origin goods cases likely to be classified as within the scope of EAR 99 that are not included in categories 9.a – 9.c.
- These cases typically involve the shipment of U.S. origin goods from the UAE to Iran.
- This category involved a range of entities and relatively low value transactions. As such, the relationship between the entities and SCB has not been individually detailed. The entities are listed on the transaction schedule in this section.
- For certain entities involved in these transactions, Promontory was unable to verify the address used by the entity in the documents reviewed or conduct any research on the entity using its search tools listed on pages 13 and 15 of this Report. For purposes of this section, each of these entities is referred to as an “Unverified Entity”.

### Transaction Overview

- An analysis of these transactions by industry sector is provided below:

Transactions Involving EAR 99 U.S. Origin Goods - Other Goods	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Energy	9	\$1,615,879	2	\$416,144
Manufacturing	6	\$611,882	1	\$45,828
Steel	1	\$74,358	1	\$74,358
Cosmetics	1	\$9,913	0	\$0
Furniture	1	\$8,889	1	\$8,889
Computer Memory Cards	1	\$152	1	\$152
<b>Total</b>	<b>19</b>	<b>\$2,321,073</b>	<b>6</b>	<b>\$545,371</b>

## 9.d. Transactions Involving EAR 99 U.S. Origin Goods - Other Goods - Transaction Summary



	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Involving EAR 99 U.S. Origin Goods - Other Goods	19	\$2,321,073	6	\$545,370

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## 9.d. Transactions Involving EAR 99 U.S. Origin Goods - Other Goods - Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value
9.d.i	LG Engineering and Construction Corp.	Oil Industries Engineering & Construction	2/16/2005	\$305,000
9.d.ii	NIOC Ahwaz Pipe Mills	Polygon Co. Ltd.	6/11/2001	\$302,188
9.d.iii	NIOC Ahwaz Pipe Mills	Polygon Co. Ltd.	2/12/2006	\$291,119
9.d.iv	Kala Naft	Metso Automation FZE	8/22/2002	\$197,132
9.d.v	P.C.C. (UK) Ltd.	APC Intl. FZE	1/16/2003	\$196,973
9.d.vi	Al Modather General Trading Co.	Taim (UK) Ltd.	2/27/2004	\$155,406
9.d.vii	Gilan Safety Glass Co.	MPE Multi-Products Enterprises	3/21/2005	\$126,423
9.d.viii	Havasaz Ind. And Mfg. Co.	Green Sciencetech General Trading LLC	7/10/2006	\$125,025
9.d.ix	Persia Kala Gostar Co	Al Modather General Trading Co.	12/30/2003	\$110,383
9.d.x	Maharan Engineering Corp	MH Sys FZCO	11/12/2004	\$100,050
9.d.xi	Bandar Abbas Oil Refining Co.	Saiffee Trading. Est.	11/9/2004	\$97,926
9.d.xii	Kaavian Steel Co.	Wabco Standard Trane SA	9/28/2005	\$74,358
9.d.xiii	Bernoulli Co.	Keft Trading	10/16/2002	\$73,162
9.d.xiv	Noor Ista Plastic Co.	Acme General Trading LLC	1/2/2004	\$69,447
9.d.xv	Rang Afarin Co.	ENOC International Sales LLC	4/26/2006	\$45,828
9.d.xvi	Kala Naft	Sigma Enterprises Oilfields Supply Division	1/20/2002	\$31,700
9.d.xvii	Poobar Company PJS	Resser LLC	11/10/2004	\$9,913
9.d.xviii	Yaran Dena Shargh	Acme General Trading LLC	5/22/2006	\$8,889
9.d.xix	Avand Karan Asia	Acme General Trading LLC	3/13/2006	\$152

**Applicant: LG Engineering and Construction Corp., Korea**  
**Beneficiary: Oil Industries Eng. And Construction, Iran**

Value:	\$305,000
Transaction Date:	2/16/2005

Program:	Iran		Product Type:	Advising Bank for Back-to-Back Export Letter of Credit and Payment Under Export Letter of Credit; Bills Collection
Case Reference:	9.d.i		Post April 12, 2005:	Yes <sup>1</sup>
Letter of Credit Amount:	\$9,984,783		Payment Status:	Confirmed
Payments for U.S. Goods:	\$305,000 <sup>1</sup>		Total Payments:	31 payments totaling \$9,362,592
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	U.S., UK, Canada, Korea
Description:	Back-to-back Letter of Credit involving the shipment of goods to an Iranian chemical manufacturer by Korean energy engineering and construction services firm via an Iranian oil and gas field engineering service.		Goods Description:	"Engineering, procurement and Supply of Equipment, Machinery Materials, Control Systems, Electrical Systems and Technical Assistance"
EAR 99 Item:	Yes		Consistent with Line of Business:	No
Shell Company Involvement:	No		Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes		Other Possible U.S. Connection:	No
Other Details:	<sup>1</sup> 3 negotiations involved the shipment of U.S. origin goods. 1 negotiation involved only U.S. goods valued at \$5,060, and occurred after April 12, 2005. U.S. origin goods include valves and fittings. No evidence in hard copy documents to indicate the likelihood of direct export. Transaction is a subordinate Letter of Credit to an original Letter of Credit issued by Bank Tejarat, Iran, for Applicant Fanavaran Petrochemical Company of Iran, in favor of Beneficiary LG Engineering and Construction Corp., Korea. Hard copy of Advising Letter of Credit could not be located. SCB, Dubai is the "Available With" Bank.			





**Applicant: NIOC Ahwaz Pipe Mills / Iran**  
**Beneficiary: Polygon Co. Ltd. / Cyprus**

Value:	\$302,188
Transaction Date:	6/11/2001

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit; Discounted Export Documents, Markazi Refinance
Case Reference:	9.d.ii	Post April 12, 2005:	No
Letter of Credit Amount:	\$309,267	Payment Status:	Confirmed
Payments for U.S. Goods:	\$302,188	Total Payments:	2 payments : \$182,327 and \$119,861
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin spare parts to a government-owned oil producer in Iran via Unverified Entity in Cyprus.	Goods Description:	"Pump Spare Parts"
EAR 99 Item	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	None
Other Details:	Itemization of goods includes a list of engine parts such as transmission, fly wheel assembly, differential drive and gear, and valves. No evidence in hard copy documents to indicate the likelihood of direct export.		

NOTES: ORDER NO.: LRS-70048  
 BANK MELL: IRAN, NADERI BRANCH L/C NUMBER FL15978701859  
 GOODS INSURED IN IRAN BY IRAN INSURANCE CO. TELEX NO.: 212762BIMH  
 POLICY NO: DR/69/4111/1  
 IRANIAN CUSTOMS TARIFF NUMBER 8413/81 AND 8413/91  
 GOODS PACKED IN CASES

We hereby declare that the above goods were produced and / or manufactured in  
 •/• ORIGINATED IN U.S.A.

**CONFIDENTIAL**



**Applicant: NIOC Ahwaz Pipe Mills / Iran**  
**Beneficiary: Polygon Co. Ltd. / Cyprus**

Value:	\$291,119
Transaction Date:	2/12/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit; Discounted Export Documents, Markazi Refinance
Case Reference:	9.d.iii	Post April 12, 2005:	No
Letter of Credit Amount:	\$291,119	Payment Status:	Confirmed
Payments for U.S. Goods:	\$291,119	Total Payments:	\$291,119
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin spare parts to a government-owned oil producer in Iran via Unverified Entity in Cyprus.	Goods Description:	"Spare Parts"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	None
Other Details:	Itemization of goods includes a list of engine parts such as transmission, fly wheel assembly, differential drive and gear, and valves. No evidence in hard copy documents to indicate the likelihood of direct export.		

NOTES:  
 ORDER NO. LRG-70162  
 BANK MELLIRI IRAN HADEKI BRANCH  
 /C NUMBER: FL15928701945  
 IRANIAN CUSTOMS TAX/IFT NUMBER B463/40 AND A481/80 AND B463/10  
 GOODS PACKED IN CASE

*(Signature)*  
 We hereby declare that the above goods were produced and/or manufactured in U.S.A.

**Applicant: Kala Naft / Iran**  
**Beneficiary: Metso Automation FZE / UAE**

Value:	\$197,132
Transaction Date:	8/22/2002

<b>Program:</b>	Iran	<b>Product Type:</b>	Export Bills Collection and Payment
<b>Case Reference:</b>	9.d.iv	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$197,132	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$197,132	<b>Total Payments:</b>	\$197,132
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin goods to an Iranian energy procurement company via a UAE subsidiary of an international energy industry supplier.	<b>Goods Description:</b>	"Valves, Spare Kit and Smart Digital Positioner"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	No
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes, see other details
<b>Other Details:</b>	Possibility of direct export, based on the review of a similar transaction in Section 10.b. of the Report, involving the same parties and inspection certificates on Metso U.S. letterhead referencing an Iranian Beneficiary.		


1. APPLICATION TO IMPORTATION TO THE STATE OF DUBAI, ALL PORTS AND AIRPORTS	2. CERTIFICATE OF ORIGIN FOR EXPORT TO THE STATE OF DUBAI, ALL PORTS AND AIRPORTS	3. CERTIFICATE OF ORIGIN FOR EXPORT TO THE STATE OF DUBAI, ALL PORTS AND AIRPORTS
<p><b>DUBAI</b>          DEPARTMENT OF CUSTOMS &amp; EXCISE</p> <p><b>CERTIFICATE OF ORIGIN</b></p> <p>NO. 151167</p> <p>COUNTRY OF ORIGIN: U.S.A.</p>		

**CONFIDENTIAL**

**Applicant: P.C.C. (UK) Ltd. / UK on behalf of Razi Petrochemical / Iran**  
**Beneficiary: APC Intl. FZE / UAE**

Value:	\$196,973
Transaction Date:	1/16/2003

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	9.d.v	Post April 12, 2005:	No
Letter of Credit Amount:	\$196,973	Payment Status:	Confirmed
Payments for U.S. Goods:	\$196,973	Total Payments:	\$196,973
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	None in File
Description:	Shipment of goods to an Iranian petrochemical company via a UK-based Iranian-government energy procurer by a UAE manufacturer of industrial machinery.	Goods Description:	"Spare Parts For Hazelton Centrifugal Pumps"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	Yes	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	Yes, Hazelton
Other Details:	Commercial invoice states that goods were of U.S. origin. Manufacturer is not indicated in shipping documents. No evidence in hard copy documents to indicate the likelihood of direct export.		

<b>WE HEREBY DECLARE:</b> THAT THE GOODS HAVE BEEN DESCRIBED EXACTLY IN ACCORDANCE WITH THE OFFER. THAT THE PRICES STATED ARE CURRENT EXPORT MARKET PRICES FOR THE GOODS DESCRIBED THEREIN. WE HEREBY CERTIFY ORIGIN OF GOODS AND THEIR MANUFACTURE IN USA, AND ARE SUPPLIED BY APC INTERNATIONAL FZE. COUNTRY OF ORIGIN: U.S.A.	
for APC International FZE  Sandeep Arora Authorized Signatory	



**Applicant: Al Modather General Trading Co. / UAE**  
**Beneficiary: Taim (UK) Ltd. / UK**

Value:	\$155,406
Transaction Date:	2/27/2004

Program:	Iran		Product Type:	Import Letter of Credit and Payment Under Import Letter of Credit
Case Reference:	9.d.vi		Post April 12, 2005:	No
Letter of Credit Amount:	\$155,406		Payment Status:	Confirmed
Payments for U.S. Goods:	\$155,406		Total Payments:	\$155,406
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods to a UAE general trader specializing in bitumen, petroleum products, and leather via an unverified UK entity with a possible shell address.		Goods Description:	"Spare Parts For Continental EMSCO Triplex Mud Pump"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	Yes		Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No		Other Possible U.S. Connection:	Yes, National Oilwell Varco
Other Details:	Possibility of direct export when viewed in conjunction with a similar case in this section, where Al Modather ships similar goods to an Iranian entity. The commercial invoice lists manufacturer of goods as National Oilwell Varco, a U.S. based company.			

EXPORTER  
TAIM (UK) LTD  
SUITE 201, 37 STURGE STREET  
LONDON WC1E 7OF  
ENGLAND, UK

375390

COPY

شركة تيم

CERTIFICATE OF ORIGIN

13A

IMPORTER  
NATIONAL OILWELL VARCO  
P.O. BOX 994 DEER CREEK  
ALBUQUERQUE, NM 87106  
U.S.A.

**CONFIDENTIAL**

**Applicant: Gilan Safety Glass Co. / Iran**  
**Beneficiary: MPE Multi-Products Enterprises / UAE**

Value:	\$126,423
Transaction Date:	3/21/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	9.d.vii	Post April 12, 2005:	No
Letter of Credit Amount:	\$126,423	Payment Status:	Confirmed
Payments for U.S. Goods:	\$126,423	Total Payments:	\$126,423
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of goods from Belgium to Iran to an Iranian manufacturer of glass products by a UAE trading company.	Goods Description:	"Polyvinyl Butyral Film (Automotive Type)"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	No
Other Details:	Shipping documents reference Beneficiary's head office located in Switzerland. No information on U.S. manufacturer is available. No other evidence in hard copy documents to indicate the likelihood of direct export. SCB, Dubai is "Available With" Bank.		

<b>1. EXPORTER</b> MULTI PRODUCTS ENTERPRISES (L.L.C.) P.O. BOX 3008, DUBAI UNITED ARAB EMIRATES FAX: (011-4) 281 1802	<b>2. NOTIFY PARTY</b> GILAN SAFETY GLASS CO. P.O. BOX 98 WEST BAY ABU DHABI U.A.E.	<b>CERTIFICATE OF ORIGIN</b> NO. 77926 U.S.A.
--	---	---



**Applicant: Havasaz Ind. And Mfg. Co. / Iran**  
**Beneficiary: Green Sciencetech General Trading LLC / UAE**

Value:	\$125,025
Transaction Date:	7/10/2006

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment Under Export Letter of Credit: Discounted Export Documents
Case Reference:	9.d.viii	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$125,025	Payment Status:	Confirmed
Payments for U.S. Goods:	\$125,025	Total Payments:	\$125,025
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin Carlyle Compressors to an energy engineering company via a general trader in the UAE.	Goods Description:	"Carlyle Compressors"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	Yes	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes, Carlyle
Other Details:	Possibility of direct export based on internet research indicating several other companies listed with the P.O. Box detailed for the Beneficiary. Such information may give indication of a potential shell company. SCB, Dubai is the "Available With" Bank.		



**CONFIDENTIAL**



**Applicant: Persia Kala Gostar Co / Iran**  
**Beneficiary: Al Modather General Trading Co. / UAE**

Value:	\$110,383
Transaction Date:	12/30/2003

Program:	Iran	Product Type:	Export Bills Collection and Payment Under Advising Export Letter of Credit
Case Reference:	9.d.ix	Post April 12, 2005:	No
Letter of Credit Amount:	\$110,383	Payment Status:	Confirmed
Payments for U.S. Goods:	\$110,383	Total Payments:	\$110,383
U.S. Persons:	Clearer: None	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods to Iranian Exporter of rubber processing oil and slack wax via UAE general trader specializing in bitumen, petroleum products and leather.	Goods Description:	"Spare Parts for CE Triplex Mud Pumps"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes, National Oilwell Varco
Other Details:	Possibility of direct export when viewed in conjunction with a similar case (9.d.vi) in this section, where Al Modather acts as Applicant for similar goods. SCB, Dubai is the "Available With" Bank.		

1. EXPORTER  
 AL MODATHER GENERAL TRADING (L.L.C.)  
 P.O. BOX 8034, DUBAI  
 UNITED ARAB EMIRATES  
 TEL: 580299 FAX: 360899

١. المصدر

2. CORRESPONDENT  
 PERSIA KALA GOSTAR CO.  
 NO. 1674, EAST AZEM STREET, AFRICA AVENUE,  
 TEHRAN  
 TEL: 0098 21 304 0070, FAX: 0098 21 304 0060  
 I. R. OF IRAN

٢. العميل له

دولة الإمارات العربية المتحدة  
 DUBAI  
 CHAMBER OF COMMERCE & INDUSTRY

DATE: 18/1/2003  
 NO: 285530  
 F. COUNTRY OF ORIGIN: U.S.A.

شهادة منشأ  
 CERTIFICATE OF ORIGIN

**Applicant: Maharan Engineering Corp / Iran**  
**Beneficiary: MH Sys FZCO / UAE**

Value:	\$100,050
Transaction Date:	11/12/2004

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	9.d.x	Post April 12, 2005:	No
Letter of Credit Amount:	\$134,000	Payment Status:	Confirmed
Payments for U.S. Goods:	\$100,050	Total Payments:	\$100,050
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods to an Iranian consulting firm for industrial automation and building management systems via a UAE manufacturer of railway-signaling systems and peripherals.	Goods Description:	"Reflow Oven"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes, Heller Industries
Other Details:	Research indicates that the goods were likely to have been manufactured by Heller Industries, a U.S. based company. No other evidence in hard copy documents to indicate the likelihood of direct export. SCB, Dubai is the "Available With" Bank.		

<b>1. BENEFICIARY/SHIPPER</b> MH-SYS FZCO P.O. BOX 18877, JEBEL ALI FREE ZONE, DUBAI UNITED ARAB EMIRATES	<b>2. APPLICANT</b> MAHARAN ENGINEERING CORP ZIA YAKED DASTVAREH ST TEHRAN 1998 IRAN	<b>3. CERTIFICATE OF ORIGIN</b> DATE: 01/13/2005 NO: 316844 T. COUNTRY OF ORIGIN: U.S.A.
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**CONFIDENTIAL**



**Applicant: Bandar Abbas Oil Refining Co. / Iran**  
**Beneficiary: Saifee Trading. Est. / UAE**

Value:	\$97,926
Transaction Date:	11/9/2004

Program:	Iran		Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	9.d.xi		Post April 12, 2005:	No
Letter of Credit Amount:	\$97,926		Payment Status:	Confirmed
Payments for U.S. Goods:	\$97,926		Total Payments:	\$97,926
U.S. Persons:	Clearer:	None	Certificate of Origin:	100% U.S.
Description:	Shipment of goods to the refinery arm of the National Iranian Oil Refining & Distribution Company (NIORDC) via a UAE procurement company specializing in spare parts for oil tankers and ships.		Goods Description:	"Rubber Flexible Hose"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No		Other Possible U.S. Connection:	Yes, Apollo International Corp.
Other Details:	Possibility of direct export as Certificates of Inspection are from U.S. entity Apollo International Corp., and were certified to Beneficiary prior to transaction. SCB, Dubai is the "Available With" Bank.			

<b>1. EXPORTER</b> SAIFE TRADING EST P.O. BOX 251408 DUBAI	<b>2. COMMERCE</b> NIORDC NIORDC ARABIAN REPUBLIC (U.S.) BANDAR ABBAH (U.S. OF OMAN)	<b>3. CERTIFICATE OF ORIGIN</b> DATE: 11/9/2004 NO: 29333 U.S.A.
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Value:	\$74,358
Transaction Date:	9/28/2005

[illegible]

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**Applicant: Bernoulli Co. / Iran**  
**Beneficiary: Keft Trading / UAE**

Value:	\$73,162
Transaction Date:	10/16/2002

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	9.d.xiii	Post April 12, 2005:	No
Letter of Credit Amount:	\$73,162	Payment Status:	Confirmed
Payments for U.S. Goods:	\$73,162	Total Payments:	\$73,162
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of goods to an Iranian manufacturer and installer of air conditioning systems via a UAE dealer in electrical apparatus and equipment.	Goods Description:	"Air Conditioning Spare Parts"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	No
Other Details:	Shipping documents indicate goods include flow raters, fan blades, expansion valves and compressors. No other evidence in hard copy documents to indicate the likelihood of direct export. SCB, Dubai is the "Available With" Bank.		



**Applicant: Noor Ista Plastic Co. / Iran**  
**Beneficiary: Acme General Trading LLC / UAE**

Value:	\$69,447
Transaction Date:	1/2/2004

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	9.d.xiv	Post April 12, 2005:	No
Letter of Credit Amount:	\$76,491	Payment Status:	Confirmed
Payments for U.S. Goods:	\$69,447	Total Payments:	Two payments of \$28,993 and \$40,454
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods by a UAE wholesaler to an industrial manufacturer of plastic-based products in Iran.	Goods Description:	"SMC Machine Parts"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Yes, Red Lion Controls, Apollo Valves, SMC Corp.
Other Details:	Research of part numbers on shipping documents indicate Red Lion Controls, Apollo Valves and SMC Corp. as likely U.S. manufacturers of the goods. No other evidence in hard copy documents to indicate the likelihood of direct export. SCB, Dubai is the "Available With" Bank.		

<b>1. EXPORTER</b> BAHR AL ARAQ GENERAL TRADING CO (L.L.C.) P.O. BOX 148100 DUBAI U.A.E.	<b>2. IMPORTER / APPLICANT</b> NOOR ISTA PLASTIC CO TOWER 17 P.O. BOX 148100	<b>3. CERTIFICATE OF ORIGIN</b> NO: 317410 U.S. Country of Origin: U.S.A.
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**Applicant: Rang Afarin Co. / Iran**  
**Beneficiary: ENOC International Sales LLC / UAE**

Value:	\$45,828
Transaction Date:	4/26/2006

Program:	Iran		Product Type:	Export Letter of Credit and Deferred Payment Under Export Letter of Credit: Discounted Export Documents
Case Reference:	9.d.xv		Post April 12, 2005:	Yes
Letter of Credit Amount:	\$45,828		Payment Status:	Confirmed
Payments for U.S. Goods:	\$45,828		Total Payments:	\$45,828
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin paint hardener from India by a UAE-government owned energy company to an Iranian paint manufacturer.		Goods Description:	"Aradur 424"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No		Other Possible U.S. Connection:	Yes, Huntsman Corporation
Other Details:	Research indicates that the manufacturer of goods is Huntsman Corporation, a U.S. based chemical company. No other evidence in hard copy documents to indicate the likelihood of direct export.			

<b>1. EXPORTER</b> ENOC INTERNATIONAL SALES (L.L.C.) P.O. BOX 444, DUBAI UNITED ARAB EMIRATES	<b>2. قارر</b>	 وزارة التجارة والصناعة U.A.E. MINISTRY OF COMMERCE & INDUSTRY
<b>3. COMMODITY</b> RANG MELLI IRAN RANG MELLI IRAN TEHRAN, I.R. OF IRAN	<b>2. قارر</b>	
<b>4. DATE</b> 2006/05/05 <b>5. NO.</b> 122220 <b>6. COUNTRY OF ORIGIN</b> U.S.A.		<b>شهادة منشأ</b> <b>CERTIFICATE OF ORIGIN</b> رقم: 122220 بلد المنشأ: U.S.A.

**Applicant: Kala Naft / Iran**

**Beneficiary: Sigma Enterprises Oilfields Supply Division / UAE**

Value:	\$31,700
Transaction Date:	1/20/2002

<b>Program:</b>	Iran	<b>Product Type:</b>	Export Letter of Credit and Deferred Payment Under Export Letter of Credit: SCB, Dubai – "Available With" Bank
<b>Case Reference:</b>	9.d.xvi	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	AED 116,340 (\$31,700)	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	AED 116,340 (\$31,700)	<b>Total Payments:</b>	AED 116,340 (\$31,700)
<b>U.S. Persons:</b>	<b>Clearer:</b> None	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin goods to an Iranian energy procurement company via a UAE energy conglomerate.	<b>Goods Description:</b>	"Parts For Pneumatic Safety Spinning SSW 10"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	No
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes, Varco
<b>Other Details:</b>	Inspection certificate for goods in file from U.S. entity Varco is dated six months prior to transaction. No other evidence in hard copy documents to indicate the likelihood of direct export.		

01	180	0123164000	42,720.00	42,720.00
		METER ASSEMBLY # 14054		
02	00 NO	0123161244	1,227.00	73,620.00
		ADJUSTABLE LEAK # 11902		
		MANUFACTURER: VARCO		
		COUNTRY OF ORIGIN: U.S.A.		
		MARK: (PERSIAN GULF)		

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**Applicant: Poober Company PJS / Iran**  
**Beneficiary: Resser LLC / UAE**

Value:	\$9,913
Transaction Date:	11/10/2004

<b>Program:</b>	Iran	<b>Product Type:</b>	Export Bills Collection and Payment
<b>Case Reference:</b>	9.d.xvii	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$9,913	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$9,913	<b>Total Payments:</b>	\$9,913
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin cosmetics to an Iranian subsidiary of a Denmark cosmetics company via a UAE cosmetics wholesaler.	<b>Goods Description:</b>	"Sunscreen, Eye Crème, Neoceutical HQ Skin Lightening Gel, Neoceutical Nail Conditioning Solution"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	No
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes, Neostrata Co.
<b>Other Details:</b>	Manufacturer of goods, Neostrata Co., a U.S. company, is identified on the shipping documents for the transaction. The goods involved in the transaction are cosmetics. No other evidence in hard copy documents to indicate the likelihood of direct export.		





**Applicant: Yaran Dena Shargh / Iran**  
**Beneficiary: Acme General Trading LLC / UAE**

Value:	\$8,889
Transaction Date:	5/22/2006

<b>Program:</b>	Iran	<b>Product Type:</b>	Payment Under Export Letter of Credit; Bills Collection; Discounted Export Documents
<b>Case Reference:</b>	9.d.xviii	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$8,889	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$8,889	<b>Total Payments:</b>	\$8,889
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	100% U.S.
<b>Description:</b>	Shipment of U.S. origin furniture from a general trading company in the UAE to an unverified entity in Iran.	<b>Goods Description:</b>	"Furniture"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	No
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	None
<b>Other Details:</b>	Shipping documents do not indicate the U.S. manufacturer of the goods. No other evidence in hard copy documents to indicate the likelihood of direct export.		



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**Applicant: Avand Karan Asia / Iran**  
**Beneficiary: Acme General Trading LLC / UAE**

Value:	\$152
Transaction Date:	3/13/2006

<b>Program:</b>	Iran	<b>Product Type:</b>	Payment Under Export Letter of Credit; Bills Collection; Discounted Export Documents
<b>Case Reference:</b>	9.d.xix	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$9,537	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$152 <sup>1</sup>	<b>Total Payments:</b>	\$9,537
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	U.S., Singapore, China and Taiwan
<b>Description:</b>	Shipment of computer memory cards via a UAE general trader to a furniture company in Iran.		
<b>Goods Description:</b>	"Computer Memory Cards"		
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	No
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	Yes, Lexar
<b>Other Details:</b>	<sup>1</sup> Review of shipping documents indicate that 1.59% of the shipment was of U.S. origin. U.S. origin goods were manufactured by Lexar. No other evidence in hard copy documents to indicate the likelihood of direct export.		

1. Exporter 2. Importer 3. Country of Origin 4. Country of Destination 5. Commodity Code 6. Date of Shipment 7. Date of Invoice 8. Date of Bill of Lading 9. Date of Certificate of Origin 10. Date of Payment	11. Country of Origin 12. Country of Destination 13. Commodity Code 14. Date of Shipment 15. Date of Invoice 16. Date of Bill of Lading 17. Date of Certificate of Origin 18. Date of Payment	19. Country of Origin 20. Country of Destination 21. Commodity Code 22. Date of Shipment 23. Date of Invoice 24. Date of Bill of Lading 25. Date of Certificate of Origin 26. Date of Payment
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## 10. Transactions With Some Evidence of U.S. Origin Goods

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## 10. Transactions With Some Evidence of U.S. Origin Goods

### Transactions With Some Evidence of U.S. Origin

- These are transactions which, during our review, were identified as having some indication of U.S. origin goods, but where there was no Certificate of Origin confirmed by a Chamber of Commerce. This section has 4 subcategories, which are outlined below:

#### Mixed Origin Goods

- There were a number of cases where the Certificate of Origin in the hard copy file listed the United States as one of a number of countries from which the goods may have originated, and there was insufficient evidence to prove or disprove which goods or portion of goods originated from the U.S.

#### Unconfirmed Certificate of Origin

- There were a number of cases where there was a reference in electronic data or documentary evidence to some or all of the goods being of U.S. origin, but there was no Certificate of Origin confirmed by a Chamber of Commerce.

#### Blue Sky Group

- There was 1 transaction involving Blue Sky and Mahan where the goods involved—an Airbus A320-232 MSN 530, which is likely to have contained U.S. origin parts—appears to have been continuously outside of the United States on and since May 7, 1995. However, there is evidence suggesting a possible U.S. nexus in this transaction involving a U.S. leasing company.

#### Unconfirmed Aviation Goods

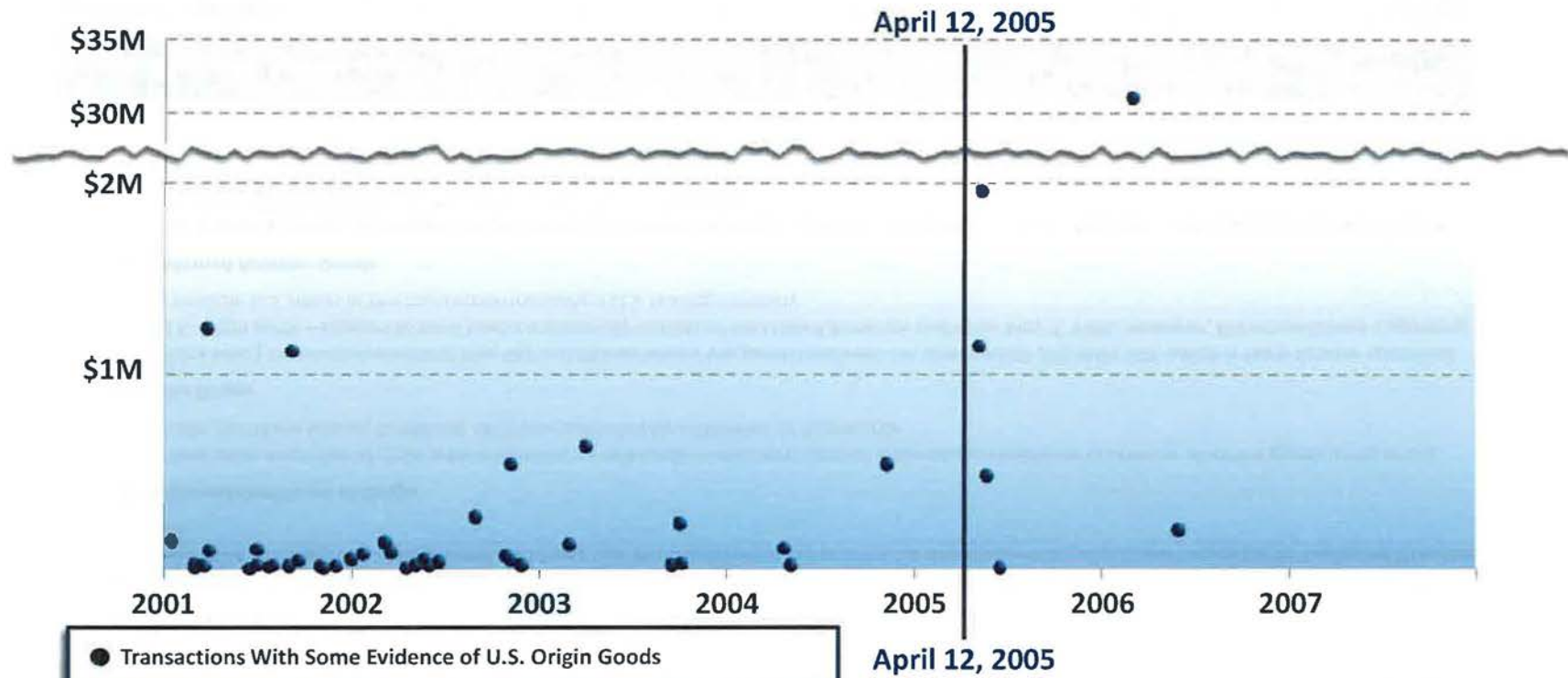
- There were a number of transactions involving the shipment of aviation goods to Iran by Mac Aviation, Jetpower, and Downtown for which there was no Certificate of Origin confirmed by a Chamber of Commerce.

Transactions With Some Evidence of U.S. Origin Goods	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
10.a. Mixed Origin Goods	7	\$1,487,707	1	\$484,155
10.b. Unconfirmed Shipment	6	\$3,554,063	4	\$3,311,984
10.c. Blue Sky Group	1	\$31,000,000	1	\$31,000,000
10.d. Unconfirmed Aviation Goods	34	\$5,134,304	0	\$0
<b>Total</b>	<b>48</b>	<b>\$41,176,074</b>	<b>6</b>	<b>\$34,796,139</b>

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## 10. Transactions With Some Evidence of U.S. Origin Goods – Transaction Summary



	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions With Some Evidence of U.S. Origin Goods	48	\$41,176,074	6	\$34,796,139

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## 10.a. Transactions With Some Evidence of U.S. Origin Goods - Mixed Origin Goods - Transaction Details

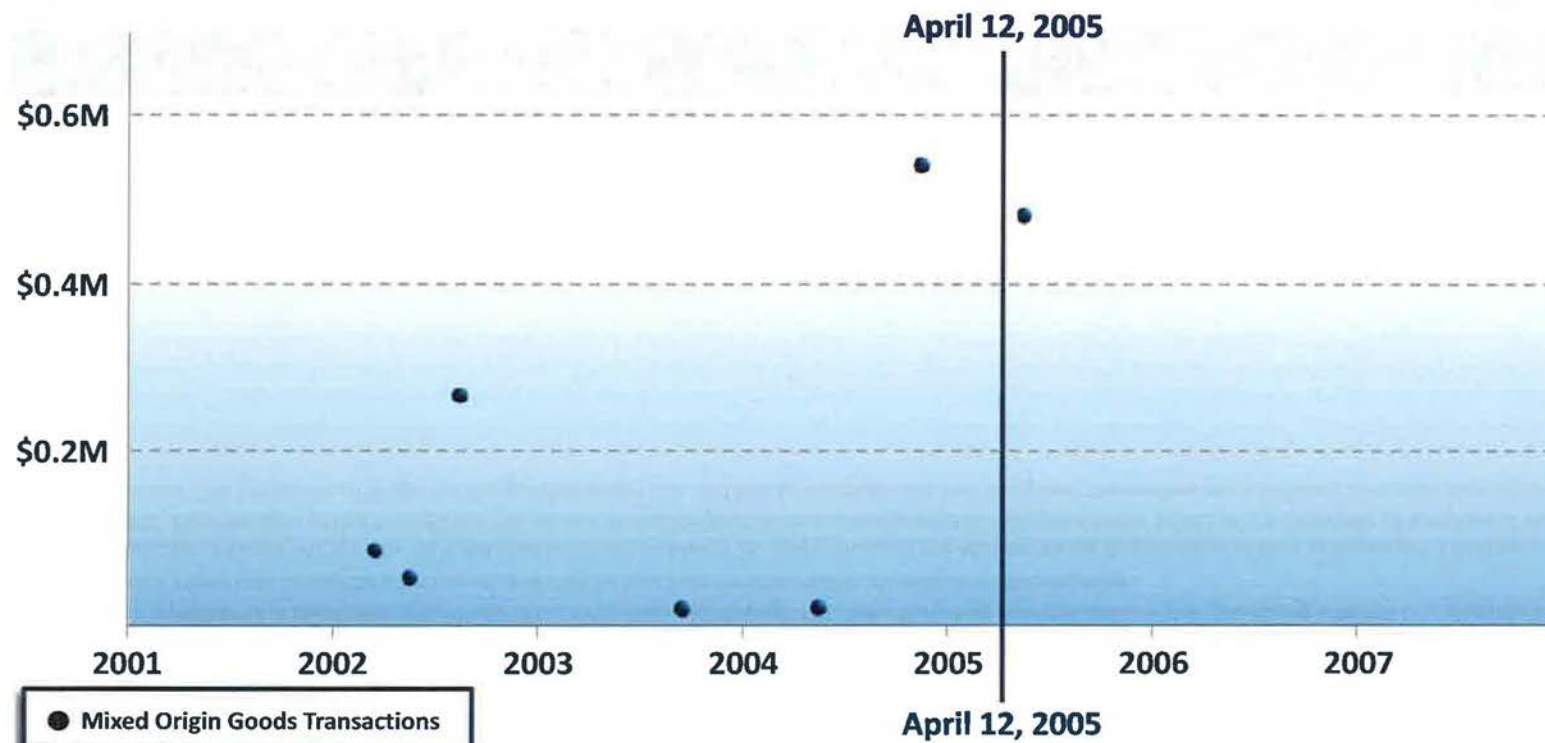
### Transactions With Some Evidence of U.S. Origin Goods - Mixed Origin Goods

- This category contains transactions where the Certificate of Origin in the hard copy file lists the United States as one of a number of countries from which the goods may have originated, and there is insufficient evidence to prove or disprove which goods or portion of goods originated in which country.
- The category consists of 7 transactions with a total value of \$1,487,707.
- The packing lists and commercial invoices for these transactions did not indicate the proportion of U.S. origin goods that were contained in the shipment.
- There is evidence that payments under these transactions cleared through SCB, New York; however, the dollar value associated with the U.S. origin goods in these transactions cannot be ascertained, and may be less than the total dollar value paid for the shipment.
- 1 transaction, a Letter of Credit for \$89,234 that occurred on March 18, 2002, involved the Atomic Energy Organization of Iran, as Applicant. Effective June 29, 2005, after the date of this transaction, the Atomic Energy Organization was designated by Executive Order 13382 as a proliferator of weapons of mass destruction. The Certificate of Origin for the goods indicate U.S. and Malaysian origin and that the goods themselves were network computer accessories.

Transactions With Some Evidence of U.S. Origin Goods - Mixed Origin Goods	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Energy	5	\$1,377,054	1	\$484,155
Nuclear	1	\$89,234	0	\$0
Manufacturing	1	\$21,419	0	\$0
<b>Transactions With Some Evidence of U.S. Origin Goods – Mixed Origin Goods</b>	<b>7</b>	<b>\$1,487,707</b>	<b>1</b>	<b>\$484,155</b>



## 10.a. Transactions With Some Evidence of U.S. Origin Goods - Mixed Origin Goods - Transaction Summary



	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions With Some Evidence of U.S. Origin Goods - Mixed Origin Goods	7	\$1,487,707	1	\$484,155

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## 10.a. Transactions With Some Evidence of U.S. Origin Goods - Mixed Origin Goods - Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value
10.a.i	Iran Power Development Company	Mapna International	11/9/2004	\$543,223
10.a.ii	Maj Mama Company	Super Stone Mfg. Co.	5/21/2005	\$484,155
10.a.iii	Kala Naft	Metso Automation FZE	8/30/2002	\$271,646
10.a.iv	Atomic Energy Organization of Iran	Infomax General Trading	3/18/2002	\$89,234
10.a.v	Sazmane Sanaye Hava Faza	Al Futtaim Auto and Machine Co.	5/23/2002	\$57,662
10.a.vi	Maharan Engineering Corp	MH Sys FZCO	5/6/2004	\$21,419
10.a.vii	Iran Power Development Company	Mapna International	9/16/2003	\$20,368

**Applicant: Iran Power Development Company / Iran**  
**First Beneficiary: Mapna Int. /UAE; 2<sup>nd</sup> Beneficiary: Siemens AG / Germany**

Value:	\$543,223
Transaction Date:	11/9/2004

<b>Program:</b>	Iran	<b>Product Type:</b>	Advising Export Letter of Credit and Payment of Transferred Proceeds Under Export Letter of Credit: Bank Guarantee
<b>Case Reference:</b>	10.a.i	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	None can be confirmed – see 'Other Details', below.	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$543,223	<b>Total Payments:</b>	\$543,223, \$54,535, \$37,530
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	U.S., Germany, Holland, Ireland, Switzerland, Hungary, Taiwan, Italy
<b>Description:</b>	Shipment of goods that originated from a number of countries (including the United States) to an Iranian government power development company via a UAE subsidiary of an Iranian power plant management company, that obtained the goods from a German electronics manufacturer.	<b>Goods Description:</b>	"Control System for main and Auxiliary Cooling Tower"
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	No
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	Yes	<b>Other Possible U.S. Connection:</b>	No
<b>Other Details:</b>	3 negotiations occurred within the Review Period, of which only 1 included an itemized invoice in the hard copy file. The invoice indicated that 6 of 74 goods were of U.S. origin, but no USD value was provided with itemization and no other evidence was found to determine what portion of the shipment was from the United States. The remaining two negotiations, with a value of \$92,065, did not contain shipping documents and the origin of goods cannot be determined. These two negotiations are included in Section 10.b. of this report.		



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Value:	\$484,155
Transaction Date:	5/21/2005

1. <b>Classification</b> 2. <b>Originator</b> 3. <b>Emergency</b> 4. <b>WFO</b>	5. <b>U.S. DESTROY</b> 6. <b>REF ID: A772380</b>	7. <b>Transmit Date</b> 8. <b>04/03/2003</b>	9. <b>Transmit Time</b> 10. <b>07:30A</b>	11. <b>From</b> 12. <b>WFO</b>	13. <b>To</b> 14. <b>WFO</b>
15. <b>Subject</b> 16. <b>U.S.A.</b>					
17. <b>Remarks</b> 18. <b>*****</b> 19. <b>*****</b> 20. <b>*****</b> 21. <b>*****</b> 22. <b>*****</b> 23. <b>*****</b> 24. <b>*****</b> 25. <b>*****</b> 26. <b>*****</b> 27. <b>*****</b> 28. <b>*****</b> 29. <b>*****</b> 30. <b>*****</b> 31. <b>*****</b> 32. <b>*****</b> 33. <b>*****</b> 34. <b>*****</b> 35. <b>*****</b> 36. <b>*****</b> 37. <b>*****</b> 38. <b>*****</b> 39. <b>*****</b> 40. <b>*****</b> 41. <b>*****</b> 42. <b>*****</b> 43. <b>*****</b> 44. <b>*****</b> 45. <b>*****</b> 46. <b>*****</b> 47. <b>*****</b> 48. <b>*****</b> 49. <b>*****</b> 50. <b>*****</b> 51. <b>*****</b> 52. <b>*****</b> 53. <b>*****</b> 54. <b>*****</b> 55. <b>*****</b> 56. <b>*****</b> 57. <b>*****</b> 58. <b>*****</b> 59. <b>*****</b> 60. <b>*****</b> 61. <b>*****</b> 62. <b>*****</b> 63. <b>*****</b> 64. <b>*****</b> 65. <b>*****</b> 66. <b>*****</b> 67. <b>*****</b> 68. <b>*****</b> 69. <b>*****</b> 70. <b>*****</b> 71. <b>*****</b> 72. <b>*****</b> 73. <b>*****</b> 74. <b>*****</b> 75. <b>*****</b> 76. <b>*****</b> 77. <b>*****</b> 78. <b>*****</b> 79. <b>*****</b> 80. <b>*****</b> 81. <b>*****</b> 82. <b>*****</b> 83. <b>*****</b> 84. <b>*****</b> 85. <b>*****</b> 86. <b>*****</b> 87. <b>*****</b> 88. <b>*****</b> 89. <b>*****</b> 90. <b>*****</b> 91. <b>*****</b> 92. <b>*****</b> 93. <b>*****</b> 94. <b>*****</b> 95. <b>*****</b> 96. <b>*****</b> 97. <b>*****</b> 98. <b>*****</b> 99. <b>*****</b> 100. <b>*****</b>					
101. <b>Director General</b> 102. <b>Director General</b> 103. <b>Director General</b> 104. <b>Director General</b> 105. <b>Director General</b> 106. <b>Director General</b> 107. <b>Director General</b> 108. <b>Director General</b> 109. <b>Director General</b> 110. <b>Director General</b> 111. <b>Director General</b> 112. <b>Director General</b> 113. <b>Director General</b> 114. <b>Director General</b> 115. <b>Director General</b> 116. <b>Director General</b> 117. <b>Director General</b> 118. <b>Director General</b> 119. <b>Director General</b> 120. <b>Director General</b> 121. <b>Director General</b> 122. <b>Director General</b> 123. <b>Director General</b> 124. <b>Director General</b> 125. <b>Director General</b> 126. <b>Director General</b> 127. <b>Director General</b> 128. <b>Director General</b> 129. <b>Director General</b> 130. <b>Director General</b> 131. <b>Director General</b> 132. <b>Director General</b> 133. <b>Director General</b> 134. <b>Director General</b> 135. <b>Director General</b> 136. <b>Director General</b> 137. <b>Director General</b> 138. <b>Director General</b> 139. <b>Director General</b> 140. <b>Director General</b> 141. <b>Director General</b> 142. <b>Director General</b> 143. <b>Director General</b> 144. <b>Director General</b> 145. <b>Director General</b> 146. <b>Director General</b> 147. <b>Director General</b> 148. <b>Director General</b> 149. <b>Director General</b> 150. <b>Director General</b> 151. <b>Director General</b> 152. <b>Director General</b> 153. <b>Director General</b> 154. <b>Director General</b> 155. <b>Director General</b> 156. <b>Director General</b> 157. <b>Director General</b> 158. <b>Director General</b> 159. <b>Director General</b> 160. <b>Director General</b> 161. <b>Director General</b> 162. <b>Director General</b> 163. <b>Director General</b> 164. <b>Director General</b> 165. <b>Director General</b> 166. <b>Director General</b> 167. <b>Director General</b> 168. <b>Director General</b> 169. <b>Director General</b> 170. <b>Director General</b> 171. <b>Director General</b> 172. <b>Director General</b> 173. <b>Director General</b> 174. <b>Director General</b> 175. <b>Director General</b> 176. <b>Director General</b> 177. <b>Director General</b> 178. <b>Director General</b> 179. <b>Director General</b> 180. <b>Director General</b> 181. <b>Director General</b> 182. <b>Director General</b> 183. <b>Director General</b> 184. <b>Director General</b> 185. <b>Director General</b> 186. <b>Director General</b> 187. <b>Director General</b> 188. <b>Director General</b> 189. <b>Director General</b> 190. <b>Director General</b> 191. <b>Director General</b> 192. <b>Director General</b> 193. <b>Director General</b> 194. <b>Director General</b> 195. <b>Director General</b> 196. <b>Director General</b> 197. <b>Director General</b> 198. <b>Director General</b> 199. <b>Director General</b> 200. <b>Director General</b> 201. <b>Director General</b> 202. <b>Director General</b> 203. <b>Director General</b> 204. <b>Director General</b> 205. <b>Director General</b> 206. <b>Director General</b> 207. <b>Director General</b> 208. <b>Director General</b> 209. <b>Director General</b> 210. <b>Director General</b> 211. <b>Director General</b> 212. <b>Director General</b> 213. <b>Director General</b> 214. <b>Director General</b> 215. <b>Director General</b> 216. <b>Director General</b> 217. <b>Director General</b> 218. <b>Director General</b> 219. <b>Director General</b> 220. <b>Director General</b> 221. <b>Director General</b> 222. <b>Director General</b> 223. <b>Director General</b> 224. <b>Director General</b> 225. <b>Director General</b> 226. <b>Director General</b> 227. <b>Director General</b> 228. <b>Director General</b> 229. <b>Director General</b> 230. <b>Director General</b> 231. <b>Director General</b> 232. <b>Director General</b> 233. <b>Director General</b> 234. <b>Director General</b> 235. <b>Director General</b> 236. <b>Director General</b> 237. <b>Director General</b> 238. <b>Director General</b> 239. <b>Director General</b> 240. <b>Director General</b> 241. <b>Director General</b> 242. <b>Director General</b> 243. <b>Director General</b> 244. <b>Director General</b> 245. <b>Director General</b>					

**Applicant: Kala Naft / Iran**

**Beneficiary: Metso Automation FZE / UAE**

Value:	\$271,646
Transaction Date:	8/30/2002

Program:	Iran		Product Type:	Export Bills Collection and Payment
Case Reference:	10.a.iii		Post April 12, 2005:	No
Letter of Credit Amount:	\$271,646		Payment Status:	Confirmed
Payments for U.S. Goods:	None can be confirmed – see 'Other Details', below.		Total Payments:	\$271,646
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	U.S. and Finland
Description:	Shipment of goods of U.S. and Finnish origin to an Iranian energy procurement company via a UAE subsidiary of an international energy industry supplier.		Goods Description:	"Parts For 'Neles-Jamesbury' Ball Valve"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No		Other Possible U.S. Connection:	Yes, Metso U.S.
Other Details:	Unable to determine the proportion of U.S. origin goods based on shipping documents. Some of the inspection certificates for goods are on Metso U.S. letterhead and reference the Iranian Beneficiary, indicating a possibility of direct export.			

<b>1. IMPORTER</b> METSO AUTOMATION FZE P.O. BOX 100000, DUBAI FREE ZONE DUBAI, U.A.E.	<b>2. CARRIER</b> METSO KALA NAFT CO. EMPLOYEES: U.S. & CAN. AVE. P.O. BOX 100000, DUBAI U.A.E.	<b>3. CERTIFICATE OF ORIGIN</b> DUBAI DEPARTMENT OF TRADE & TOURISM NO. 147566 COUNTRY OF ORIGIN: FINLAND U.A.E.
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Value:	\$89,234
Transaction Date:	3/18/2002

<p>1. EXPORTER          INTERNATIONAL TRADING CO. S.A.          P.O. BOX 24062, DUBAI          U.A.E.</p>	<p>مصدر البضاعة          DUBAI          (EXPORTER OF COMMODITY &amp; SERVICES)</p>
<p>2. COMMODITIES          ALUMINUM SHEET OF 0.5mm THICKNESS OF 1000mm          7000mm          1500mm</p>	<p>نوع البضاعة          نهضة ننتا          CERTIFICATE OF ORIGIN          NO. 42481          1. COUNTRY OF ORIGIN:          U.A.E.          2. COUNTRY:          SAUDI ARABIA</p>



**Applicant: Sazmane Sanaye Hava Faza / Iran**  
**Beneficiary: Al Futtaim Auto and Machine Co. (FAMCO) / UAE**

Value:	\$57,662
Transaction Date:	5/23/2002

<b>Program:</b>	Iran	<b>Product Type:</b>	Export Bills Collection and Payment Under Export Letter of Credit
<b>Case Reference:</b>	10.a.v	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$57,662	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	None can be confirmed – see 'Other Details', below.		
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Total Payments:</b>	\$57,662
<b>Description:</b>	Shipment of goods of U.S. and UK origin to a non-contemporaneous Iranian SDN by a subsidiary of a UAE industrial machinery distributor.	<b>Certificate of Origin:</b>	U.S. and UK
<b>EAR 99 Item:</b>	Yes	<b>Goods Description:</b>	"Equipment As Per Invoice" (Diaphragm Pump Parts)
<b>Shell Company Involvement:</b>	No	<b>Consistent with Line of Business:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Trading Company:</b>	Yes
		<b>Other Possible U.S. Connection:</b>	Yes, IR, ARO and Parker Products
<b>Other Details:</b>	Manufacturers of goods, IR, ARO and Parker, all possess manufacturing facilities in both the U.S. and UK. Unable to determine the percentage of U.S. goods based on available shipping documents. Beneficiary is linked to the Iranian aerospace industry, hence goods may have an aerospace application, so are potentially of the type that would require a license for re-export to Iran if of U.S. origin.		

<b>1. EXPORTER</b> AL FUTTAIM AUTO & MACHINERY CO. (FAMCO) P.O. BOX 19828 DUBAI U.A.E.	<b>2. CONSIGNEE</b> SAZMANE SANAYE HAVA FAZA TEHRAN P.O. BOX 12898 I.R. OF IRAN	<b>3. CERTIFICATE OF ORIGIN</b> DUBAI (ISSUED BY CUSTOMS & EXCISE) NO. 56135 1. COUNTRY OF ORIGIN U.S.A. UNITED KINGDOM
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**CONFIDENTIAL**

**Applicant: Maharan Engineering Corp / Iran**  
**Beneficiary: MH Sys FZCO / UAE**

Value:	\$21,419
Transaction Date:	5/6/2004

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit
Case Reference:	10.a.vi	Post April 12, 2005:	No
Letter of Credit Amount:	\$21,964	Payment Status:	Confirmed
Payments for U.S. Goods:	None can be confirmed – see 'Other Details', below.	Total Payments:	\$21,419
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	U.S., Germany, Malaysia
Description:	Shipment of goods of U.S., German and Malaysian origin to an Iranian consulting firm for industrial automation and building management systems via a UAE manufacturer of railway signaling systems and peripherals.	Goods Description:	"Capacitors, Resistors, PcB Fuse Holder, Semiconductors, Computer Accessories"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	No
Other Details:	Based on a review of the available shipping documents, Promontory is unable to determine which goods originated from the three respective countries. SCB, Dubai is the "Available With" Bank.		





**Applicant: Iran Power Development Company / Iran**

**First Beneficiary: Mapna International 2<sup>nd</sup> Beneficiary: Zener Electronics / UAE**

Value:	\$20,368
Transaction Date:	9/16/2003

Program:	Iran	Product Type:	Advising Export Letter of Credit and Deferred Payment of Transferred Proceeds Under Export Letter of Credit
Case Reference:	10.a.vii	Post April 12, 2005:	No
Letter of Credit Amount:	\$20,368	Payment Status:	Confirmed
Payments for U.S. Goods:	None can be confirmed – see 'Other Details', below.	Total Payments:	\$20,368
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	U.S., UK and France
Description:	Back-to-back Letter of Credit involving the shipment of goods of U.S., UK and French origin to an Iranian government power development company via a UAE subsidiary of an Iranian power plant management company, who obtained the goods from a UAE wholesaler of electronics.	Goods Description:	"Fire Alarm Detection System"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	Two presentations made for goods in settlement of the Letter of Credit dated July 2003 and August 2003, respectively. The Certificate of Origin for the July 2003 presentation indicates goods of U.S., United Kingdom and French origin. No artifact of the Packing List from that presentation survives in the file. The Certificate of Origin, however, was revised for the August 2003 presentation and submitted with an itemized packing list certifying goods of UK and French origin. SCB, Dubai is the "Available With" Bank.		

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## 10.b. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Certificate of Origin- Transaction Details

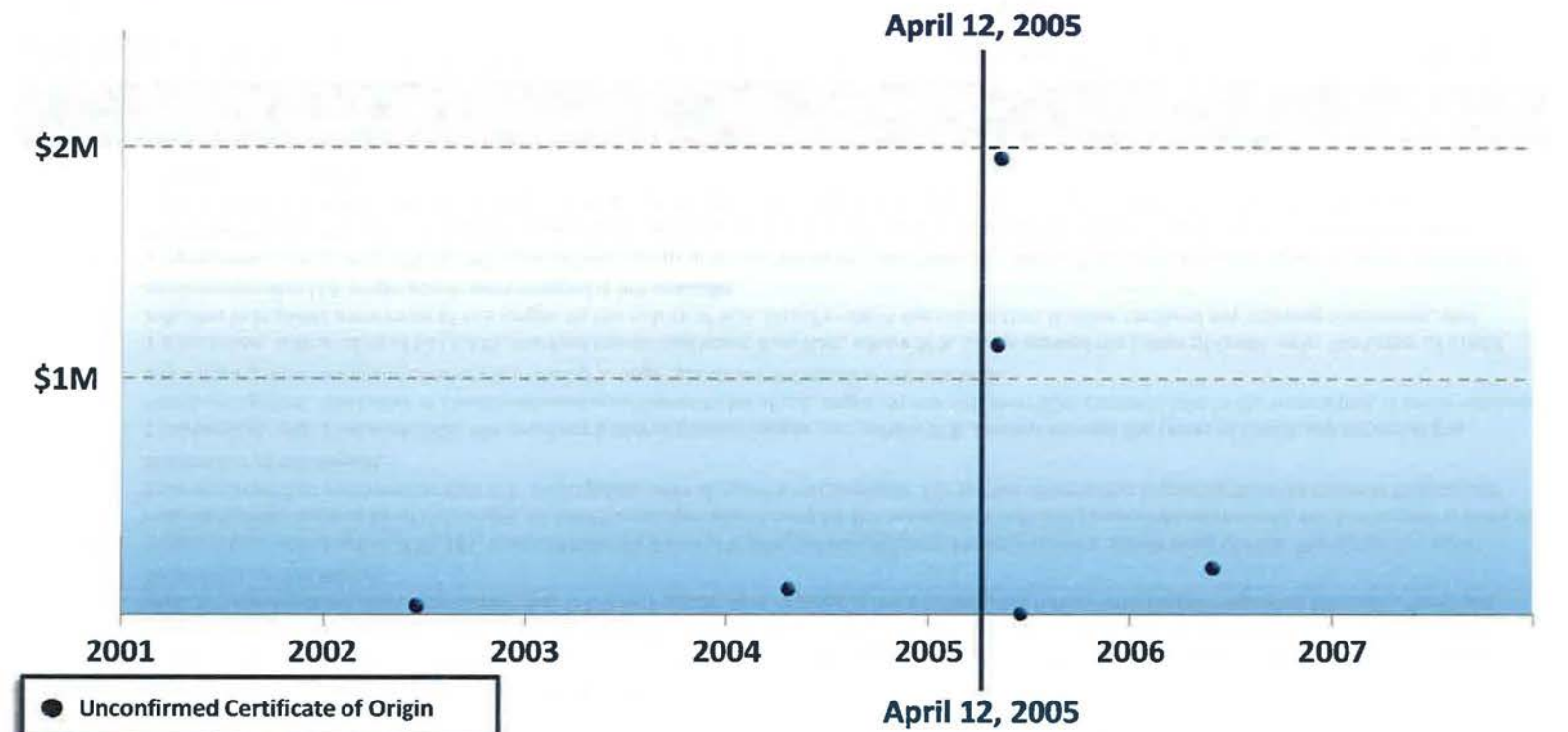
### Transactions With Some Evidence of U.S. Origin Goods – Unconfirmed Certificate of Origin

- This category contains transactions where there was a reference in electronic or documentary data to some or all of the goods being of U.S. origin, but there is no confirmed Certificate of Origin.
- The category consists of 6 transactions with a value of \$3,554,063<sup>1</sup>:
  - 2 transactions, with a value of \$3,103,000, involved Diamonds Steel, where shipping documents were absent from the file. In both cases, the Letter of Credit indicated goods were to be of U.S. origin. As SWIFT messages were found for the transactions indicating payments were made, the transactions are likely to have occurred, but confirmation that U.S. origin goods were shipped is not available. For further information regarding Diamonds Steel, see Section 9.a. of this Report.
  - 1 transaction, with a value of \$5,185, involved Bakelite General Trading where shipping documents were absent from the file. The Letter of Credit indicated goods were to be of U.S. origin. As SWIFT messages were found for the transaction indicating payments were made, the transaction is likely to have occurred, but confirmation that U.S. origin goods were shipped is not available. For further information regarding Bakelite General Trading, see Section 9.c. of this Report.
  - 1 transaction, with a value of \$203,799, involved National Iranian Copper, Inc., where SCB, London advised the Letter of Credit and served as the Reimbursing Bank. The Letter of Credit indicated goods were to be of U.S. origin. By the nature of SCB, London's role in the transaction, it never received any shipping documents and confirmation that U.S. origin goods were shipped is not available.
  - 1 transaction, with a value of \$111,235, involved Iranian Applicant, Kala Naft, where SCB, Dubai advised the Letter of Credit only. The Letter of Credit indicates that goods were to be of U.S. origin. By the nature of SCB, Dubai's role in the transaction, it never received any shipping documents, and confirmation that U.S. origin goods were shipped is not available.
  - 1 transaction, with a value of \$38,779, involved the Iranian Applicant Sepahan Lifter Company, where SCB, Dubai was nominated as silent confirming bank by the Beneficiary. The Letter of Credit indicated goods were to be of U.S. origin. By the nature of SCB, Dubai's role in the transaction, SCB, Dubai's records would not contain negotiation documents unless the Letter of Credit was in default. Accordingly, confirmation that U.S. origin goods were shipped is not available.

Transactions With Some Evidence of U.S. Origin Goods – Unconfirmed Certificate of Origin	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Steel Industry	3	\$3,306,799	3	\$3,306,799
Energy	1	\$203,300 <sup>1</sup>	0	\$0
Manufacturing	2	\$43,964	1	\$5,185
<b>Unconfirmed Certificate of Origin</b>	<b>6</b>	<b>\$3,554,063</b>	<b>4</b>	<b>\$3,311,984</b>

<sup>1</sup> Includes two negotiations totaling \$92,065 from Case Reference 10.a.i

## 10.b. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Certificate of Origin - Transaction Summary



	Volume	Value	Post April 12, 2005 Volume	Post April 12, 2005 Value
Unconfirmed Certificate of Origin	6	\$3,554,063	4	\$3,311,984

## 10.b. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Certificate of Origin - Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value <sup>1</sup>
10.b.i	Khoram Sanat Producing Co.	Diamonds Steel FZE	5/12/2005	\$1,951,500
10.b.ii	Alborz Steel Industries Co.	Diamonds Steel FZE	5/6/2005	\$1,151,500
10.b.iii	National Iranian Copper Inc.	Standard Metals LTD	5/30/2006	\$203,799
10.b.iv	Kala Naft	York International	4/22/2004	\$111,235
10.b.v	Sepahan Lifter Co.	The Kanoo Group	6/19/2002	\$38,779
10.b.vi	Sanaye Sarmaafarin Iran	Bakelite General Trading	6/16/2005	\$5,185

<sup>1</sup> In addition to these 6 transactions, the total value of \$3,554,063 for category 10.b also includes 2 negotiations totaling \$92,065 from case 10.a.i.



**Applicant: Khoram Sanat Producing Co. - Iran**  
**Beneficiary: Diamonds Steel FZE - UAE**

Value:	\$1,951,500
Transaction Date:	5/12/2005

Program:	Iran		Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit/SCB-Dubai as "Available With" Bank
Case Reference:	10.b.i		Post April 12, 2005:	Yes
Letter of Credit Amount:	\$1,951,500		Payment Status:	Confirmed
Payments for U.S. Goods:	Cannot be confirmed		Total Payments:	\$1,951,500
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	Letter of Credit states U.S. origin/No shipping documents in file.
Description:	Shipment of potential U.S. origin metal manufacturing equipment from related entities located in the UAE and Iran.		Goods Description:	"Back Up Roll Change Carriage, Spare Back Up Roll with Chuck and Main Gear Box"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes		Other Possible U.S. Connection:	None
Other Details:	Hard copies of shipping documents are not present in file. Accordingly, U.S. origin of goods cannot be confirmed. Review of MT202 confirms that payment was made after April 12, 2005.			

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**Applicant: Alborz Steel Industries Co. / Iran**  
**Beneficiary: Diamonds Steel FZE / UAE**

Value:	\$1,151,500
Transaction Date:	5/6/2005

Program:	Iran		Product Type:	Advising Export Letter of Credit and Payment; SCB, Dubai is the "Available With" Bank
Case Reference:	10.b.ii		Post April 12, 2005:	Yes
Letter of Credit Amount:	\$1,151,500		Payment Status:	Confirmed
Payments for U.S. Goods:	\$1,151,500		Total Payments:	\$1,151,500
U.S. Persons:	Clearer:	SCB, New York	Certificate of Origin:	None in File/LC States U.S. origin
Description:	Shipment of goods by a UAE steel manufacturer to an affiliate entity in Iran.		Goods Description:	"Spindle and Motor Shields (Lot)"
EAR 99 Item:	Yes		Consistent with Line of Business:	Yes
Shell Company Involvement:	No		Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes		Other Possible U.S. Connection:	No
Other Details:	Hard copies of shipping documents are not present in file. Accordingly, origin of goods cannot be confirmed. Review of MT202 confirms that payment was made after April 12, 2005.			

**Applicant: National Iranian Copper Inc., Iran**  
**Beneficiary: Standard Metals LTD. / UK**

Value:	\$203,798
Transaction Date:	5/30/2006

<b>Program:</b>	Iran	<b>Product Type:</b>	Export Letter of Credit and Payment Under Export Letter of Credit
<b>Case Reference:</b>	10.b.iii	<b>Post April 12, 2005:</b>	Yes
<b>Letter of Credit Amount:</b>	\$203,798	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	Cannot be confirmed	<b>Total Payments:</b>	\$203,798
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	Letter of Credit states U.S./No shipping docs on file.
<b>Description:</b>	Shipment of possible U.S. origin drilling equipment sent from Belgium to Iran via a UK based procurement company to its parent company in Iran.	<b>Goods Description:</b>	"SPARE PARTS FOR K.M.S."
<b>EAR 99 Item:</b>	Yes	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	No
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	Yes	<b>Other Possible U.S. Connection:</b>	None
<b>Other Details:</b>	Letter of Credit advised by SCB, London who did not participate in the payment as presentation of the documents bypassed them. At request of Saman Bank Corporation, Tehran, Iran, SCB, London advised the Letter of Credit to HSBC, London who advised Beneficiary. Subsequent request received by SCB, London to advise extension to Letter of Credit expiry was declined and file closed. SCB, Dubai was the reimbursement bank and effected payment of \$203,798, value May 30, 2006, by MT202 to SCB, New York for HSBC, New York for account of HSBC, London. As no shipping documents were presented to SCB, the U.S. origin of shipment cannot be confirmed.		

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**Applicant: Kala Naft - Iran**  
**Beneficiary: York International - UAE**

Value:	\$111,235
Transaction Date:	4/22/2004

Program:	Iran	Product Type:	Advising Export Letter of Credit
Case Reference:	10.b.iv	Post April 12, 2005:	No
Letter of Credit Amount:	\$111,235	Payment Status:	Unconfirmed
Payments for U.S. Goods:	Cannot be determined	Total Payments:	Cannot be determined
U.S. Persons:	Clearer: Cannot be determined	Certificate of Origin:	None in File/LC states U.S.
Description:	Unconfirmed shipment of purported U.S. origin parts for an absorption chiller going from UAE to Iran. Iranian Applicant is government-owned procurement company for the Iranian petroleum industry. Beneficiary is a UAE subsidiary of a U.S. incorporated entity.	Goods Description:	"Parts For Absorption Chiller Model No. 9E"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	Yes York International, U.S.
Other Details:	SCB, Dubai served as the Advising Bank on the Letter of Credit only, and was not the "Available With" Bank. SCB, Dubai would not have seen the negotiation documents after advising credit to the Beneficiary.		

**Applicant: Sepahan Lifter Co. / Iran**  
**Beneficiary: The Kanoo Group / UAE**

Value:	\$38,779
Transaction Date:	6/19/2002

Program:	Iran	Product Type:	Advising Export Letter of Credit/Silent Confirming Bank
Case Reference:	10.b.v	Post April 12, 2005:	No
Letter of Credit Amount:	AED 142,318/\$38,778	Payment Status:	Unconfirmed
Payments for U.S. Goods:	Cannot be determined	Total Payments:	Cannot be determined
U.S. Persons:	Clearer: Cannot be determined	Certificate of Origin:	None in File/LC indicates UK
Description:	Unconfirmed shipment of purported UK origin goods from UAE conglomerate to Iranian forklift manufacturer.	Goods Description:	"Spare Parts Motor For Forklift Truck"
EAR 99 Item:	No	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	No
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	Negative News regarding Applicant's indictment for attempting to circumvent Iranian export embargo sanctions in a similar transaction.
Other Details:	Documents in file indicate that SCB, Dubai and Beneficiary agreed to make SCB, Dubai the Silent Confirming bank in the transaction. The terms of the credit nominated Bank Melli, Dubai as the "Available With" Bank. Based on this, the SCB file would not contain negotiation documents unless credit was in default.		



**Applicant: Sanaye Sarmaafarin Iran / Iran**  
**Beneficiary: Bakelite General Trading / UAE**

Value:	\$5,185
Transaction Date:	6/16/2005

Program:	Iran	Product Type:	Advising Export Letter of Credit and Payment Under Export Letter of Credit : Assignment of Proceeds
Case Reference:	10.b.vi	Post April 12, 2005:	Yes
Letter of Credit Amount:	\$5,520	Payment Status:	Confirmed
Payments for U.S. Goods:	\$5,185	Total Payments:	\$5,185
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	100% U.S.
Description:	Shipment of U.S. origin goods from a general trader in the UAE to an air conditioning company in Iran.	Goods Description:	"Motor and Capacitor"
EAR 99 Item:	Yes	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	No	Other Possible U.S. Connection:	No
Other Details:	Hard copies of shipping documents are not present in file. Accordingly, U.S. origin of goods cannot be confirmed. "Available With" Bank: SCB, Dubai		

- 2-SIGNED COMMERCIAL INVOICES ISSUED BY BENEF IN 2 ORIGINALS AND 2 COPIES OF WHICH 1 ORIGINAL CERTIFIED BY THE LOCAL CHAMBER OF COMMERCE DECLARING THAT THE PRICES STATED ARE CURRENT EXPORT MARKET PRICES FOR THE MERCHANDISE DESCRIBED THEREIN.
- 3-CERTIFICATE OF ORIGIN IN 1 ORIGINAL AND 3 COPIES CONFIRMING THAT GOODS ORIGINATED IN U.S.A OF WHICH 1 ORIGINAL CERTIFIED BY THE LOCAL CHAMBER OF COMMERCE.
- 4-DETAILED PACKING LIST IN 1 ORIGINAL AND 3 COPIES. (EXPORT STANDARD PACKING)



### 10.c. Transactions With Some Evidence of U.S. Origin Goods - Blue Sky Group - Transaction Details

- There was 1 transaction with a value of \$31,000,000 that involved Blue Sky Aviation and has been classified as a Transaction With Some Evidence of U.S. Origin Goods.
- The good involved—an Airbus A320-232 MSN 530, which is likely to have contained U.S. origin parts—appears to have been continuously outside of the United States on and since May 7, 1995. However, there is evidence suggesting a possible U.S. nexus in this transaction involving a U.S. leasing company.
- For more information on Blue Sky Aviation, please refer to Section 3.e. of this Report.

Transactions With Some Evidence of U.S. Origin Goods – Blue Sky Aviation	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
10.c. Blue Sky Aviation	1	\$31,000,000	1	\$31,000,000

**Applicant: Mahan Air**  
**Beneficiary: Blue Sky Aviation**

Value:	\$31,000,000
Transaction Date:	07/10/2006

Program:	Iran	Product Type:	Export Collection
Case Reference:	10.c.i	Post April 12, 2005:	Yes
Collection Amount:	\$31,000,000	Payment Status:	Confirmed
Payments for U.S. Goods:	See Other Details, below.	Total Payments:	\$31,000,000
U.S. Persons:	Clearer: SCB, New York	Certificate of Origin:	No <sup>1</sup>
Description:	Second hand Airbus A320-232 (MSN530) carrying 2 IAE V2527-A5 series engines.	Goods Description:	Second hand Airbus A320-232 (MSN530) carrying 2 IAE V2527-A5 series engines. Exact origin and place of manufacture of the engines not determined.
EAR99 Item:	No - See Other Details, below.	Consistent with Line of Business:	Yes
Shell Company Involvement:	No	Trading Company:	Yes
Agent, Affiliate, or Subsidiary of Iranian Entity:	Yes	Other Possible U.S. Connection:	No
Other Details:	<p><sup>1</sup> Shipping documents for this collection could not be located.</p> <p>The first flight of the Airbus A320-232 took place on February 28, 1995, and the transaction history shows that it has been continually outside the U.S. since then. It is therefore assumed that most (if not all) U.S. origin content in the aircraft (including the engines) would have been exempt from the re-export prohibition cut-off date of May 7, 1995.</p> <p>During work to gather information for SCB's review of its business with Blue Sky Aviation, it has been noted that there is a record of a lease agreement relating to a different aircraft, but involving similar parties, that shows that the aircraft in that transaction, although leased by an Irish entity, ILFC Ireland, was owned by the ILFC, a U.S. person. SCB did not play a role in that transaction. No similar evidence has been found suggesting that this transaction has the same structure, but the parties involved in the transaction are similar. We have seen web sites indicating that this plane may have been leased from "ILFC" to Blue Wings, then sub-leased to Mahan. However, it is unclear from the web sites whether the ILFC entity referenced is the U.S. entity.</p> <p>Facts gathered in the course of SCB's review of its business with Blue Sky Aviation and its related parties during the Review Period will be the subject of a separate report.</p>		

## 10.d. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods - Transaction Details

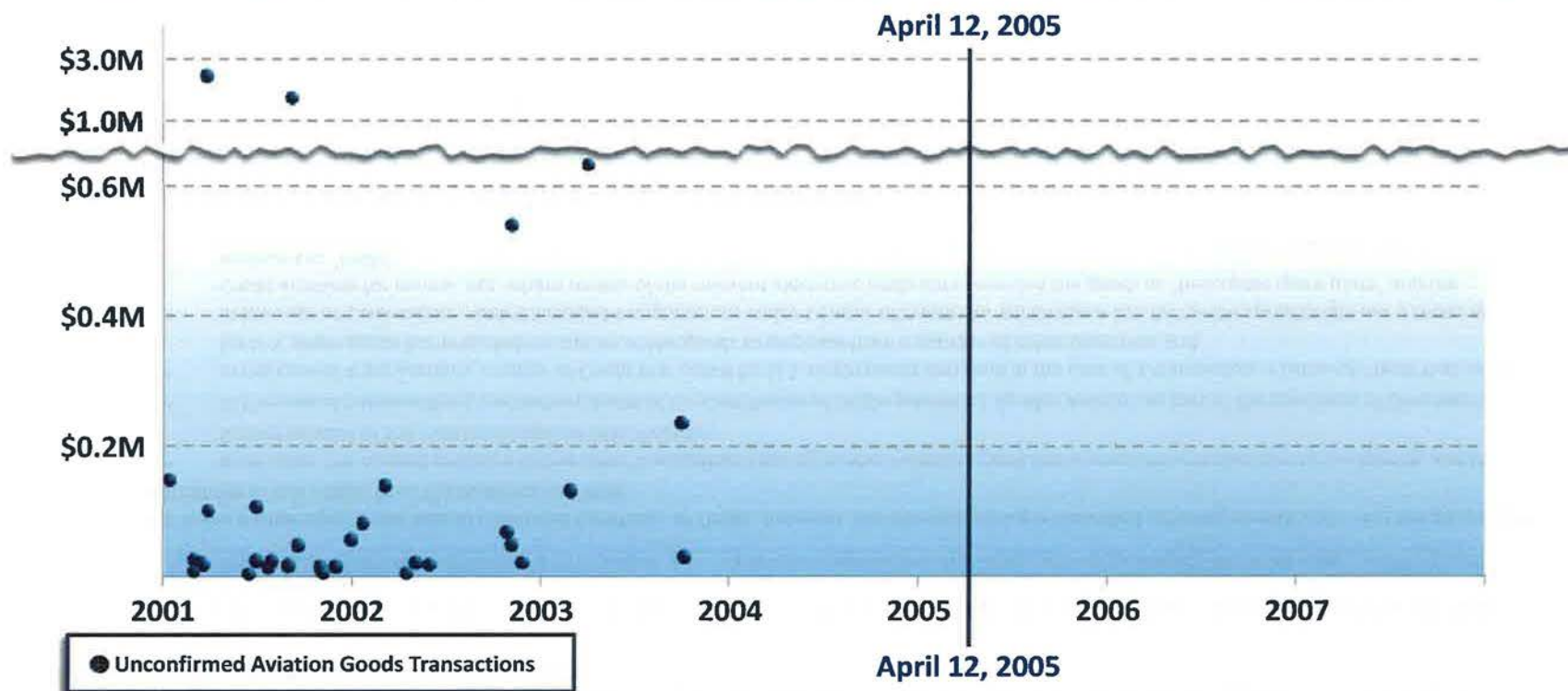
### Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods

- This category contains transactions where there was a reference in electronic or documentary data to some or all of the goods being of U.S. origin, but there is no confirmed Certificate of Origin.
- The category consists of 34 transactions, with a value of \$5,134,304, that involved either Mac Aviation, Jetpower, or Downtown.
- As Mac Aviation, Jetpower and Downtown are discussed extensively in Section 3, only summary information is provided in this section regarding their activities.

Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
10.d. Mac Aviation	11	\$4,031,323	0	\$0
10.d. Jetpower	20	\$921,421	0	\$0
10.d. Downtown	3	\$181,560	0	\$0
<b>Total</b>	<b>34</b>	<b>\$5,134,304</b>	<b>0</b>	<b>\$0</b>



# 10.d. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods - Transaction Summary



	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods	34	\$5,134,304	0	\$0

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## 10.d. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods - Mac Aviation - Summary

- There were 11 transactions with a total value of \$4,031,323 that involved Mac Aviation and have been classified as Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods.
- All these transactions followed a similar pattern (in terms of the parties involved, the flow of goods and the payments) to those transactions reported in Section 3.b. of this Report.
- For these transactions, there was no confirmed Certificate of Origin. However, the transactions were identified as having an indication that the goods were potentially of U.S. origin, from the evidence available:
  - In all cases, the context provided by the other transactions relating to Mac Aviation where there was sufficient documentary evidence, and the further context of the indictment against Mac Aviation;
  - In the case of 5 transactions, preliminary drafts of the Certificates of Origin submitted by Mac Aviation as part of the pre-check of documents;
  - In the case of 4 transactions, a Letter of Credit that called for U.S. origin goods only, and in the case of 1 transaction, a Letter of Credit that called for U.S. origin goods but provided the option of the goods to originate from a number of other countries; and
  - In the case of 1 transaction, which included 4 negotiations under 1 Letter of Credit, for which there was no Certificate of Origin nor a Letter of Credit available for review, but where review of the relevant electronic trade data recorded the goods as "helicopter spare parts" and the applicant as "IHSRC".
- For more information on Mac Aviation, please refer to Section 3.b. of this Report.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Unconfirmed Aviation Goods - Mac Aviation	11	\$4,031,323	0	\$0

#### 10.d. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods - Jetpower - Summary

- There were 20 transactions, with a value of \$921,421, that involved Jetpower and have been classified as Transactions With Some Evidence of U.S. Origin Goods – Unconfirmed Aviation Goods.
- All these transactions followed a similar pattern (in terms of the parties involved, the flow of goods and the payments) to those transactions reported in Section 3.c. of this Report.
- For these transactions, there was no confirmed Certificate of Origin. However, the transactions were identified as having an indication that the goods were potentially of U.S. origin, from the evidence available:
  - In the case of 19 of the 20 transactions, a Letter of Credit that called for U.S. origin goods; and
  - In the case of all 20 transactions, the context provided by the other transactions relating to Jetpower where there was sufficient documentary evidence.
- For more information on Jetpower, please refer to Section 3.c. of this Report.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Unconfirmed Aviation Goods - Jetpower	20	\$921,421	0	\$0



#### 10.d. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods - Downtown - Summary

- There were 3 transactions reviewed, with a value of \$181,560, that involved Downtown and have been classified as Transactions With Some Evidence of U.S. Origin Goods.
- All these transactions followed a similar pattern (in terms of the parties involved, the flow of goods and the payments) to those transactions reported in Section 3.d. of this Report.
- For these transactions, there was no confirmed Certificate of Origin. However, the transactions were identified as having an indication that the goods were potentially of U.S. origin, from the evidence available:
  - In the case of 1 transaction, a Letter of Credit calling for U.S. origin goods; and
  - The context provided by the other transactions relating to Downtown where there was sufficient documentary evidence.
- For more information on Downtown, please refer to Section 3.d. of this Report.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Unconfirmed Aviation Goods - Downtown	3	\$181,560	0	\$0

#### 10.d. Transactions With Some Evidence of U.S. Origin Goods - Unconfirmed Aviation Goods - Transaction Schedule

Case Reference	Applicant	Beneficiary	Transaction Date	Value
10.d.i	Iran Aircraft Industries	Downtown Trading Ltd.	3/6/2002	\$139,000
10.d.ii	Iran Aircraft Industries	Downtown Trading Ltd.	5/5/2002	\$21,440
10.d.iii	Iran Aircraft Industries	Downtown Trading Ltd.	11/27/2002	\$21,120

**Applicant: Iran Aircraft Industries / Iran**  
**Beneficiary: Downtown Trading Ltd. / Malaysia**

Value:	\$139,000
Transaction Date:	3/6/2002

<b>Program:</b>	Iran		<b>Product Type:</b>	Advising Export Letter of Credit and Payment; Markazi Refinance
<b>Case Reference:</b>	10.d.i		<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$364,400		<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$139,000 <sup>1</sup>		<b>Total Payments:</b>	1 payment within Review Period for a total value of \$139,000
<b>U.S. Persons:</b>	<b>Clearer:</b>	SCB, New York	<b>Certificate of Origin:</b>	Letter of Credit calls for Certificate of origin/goods of U.S. origin but no Certificate of origin on file
<b>Description:</b>	Shipment of aircraft parts from a Malaysian subsidiary of a UK general trader to an Iranian government subsidiary responsible for manufacture and repair of aircraft.		<b>Goods Description:</b>	Aircraft Spare Parts (blades, vanes)
<b>EAR 99 Item:</b>	No		<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No		<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No		<b>Other Possible U.S. Connection:</b>	No
<b>Other Details:</b>	"Available With" Bank was amended from SCB, Malaysia to SCB, Dubai in order to comply with the Bank Markazi refinance agreement.			

<sup>1</sup> Other payments related to this Letter of Credit are reported in Section 3.d.iii on U.S. origin Goods – Non EAR 99 Transactions – Inclusive Direct Export.

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**Applicant: Iran Aircraft Industries / Iran**  
**Beneficiary: Downtown Trading Ltd. / Malaysia**

Value:	\$21,440
Transaction Date:	5/5/2002

<b>Program:</b>	Iran	<b>Product Type:</b>	
<b>Case Reference:</b>	10.d.ii	<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$335,000	<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$21,440	<b>Total Payments:</b>	1 payment within Review Period for a total value of \$21,440
<b>U.S. Persons:</b>	<b>Clearer:</b> SCB, New York	<b>Certificate of Origin:</b>	None in File; Letter of Credit indicates U.S.
<b>Description:</b>	Shipment of aircraft parts from a Malaysian associate of a UK general trader to an Iranian government subsidiary responsible for manufacture and repair of aircraft.	<b>Goods Description:</b>	Aircraft Engine Spare Parts
<b>EAR 99 Item:</b>	No	<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No	<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No	<b>Other Possible U.S. Connection:</b>	No
<b>Other Details:</b>	Shipping documents for transaction unavailable for review. Accordingly, shipment of U.S. origin goods cannot be confirmed. "Available With" Bank was amended from SCB, Malaysia to SCB, Dubai in order to comply with the Bank Markazi credit facility.		

**Applicant: Iran Aircraft Industries / Iran**  
**Beneficiary: Downtown Trading Ltd. / Malaysia**

Value:	\$21,120
Transaction Date:	11/27/2002

<b>Program:</b>	Iran		<b>Product Type:</b>	Advising Export Letter of Credit and Payment; Markazi Refinance
<b>Case Reference:</b>	10.d.iii		<b>Post April 12, 2005:</b>	No
<b>Letter of Credit Amount:</b>	\$335,000		<b>Payment Status:</b>	Confirmed
<b>Payments for U.S. Goods:</b>	\$21,120 <sup>1</sup>		<b>Total Payments:</b>	1 unconfirmed payment within Review Period for a value of \$21,120
<b>U.S. Persons:</b>	<b>Clearer:</b>	SCB, New York	<b>Certificate of Origin:</b>	Letter of Credit calls for Certificate of origin/goods of U.S. origin but no Certificate of origin on file
<b>Description:</b>	Shipment of aircraft parts from a Malaysian associate of a UK general trader to an Iranian government subsidiary responsible for manufacture and repair of aircraft.		<b>Goods Description:</b>	Aircraft Engine Spare Parts (blades)
<b>EAR 99 Item:</b>	No		<b>Consistent with Line of Business:</b>	Yes
<b>Shell Company Involvement:</b>	No		<b>Trading Company:</b>	Yes
<b>Agent, Affiliate, or Subsidiary of Iranian Entity:</b>	No		<b>Other Possible U.S. Connection:</b>	No
<b>Other Details:</b>	"Available With" Bank was amended from SCB, Malaysia to SCB, Dubai in order to comply with the Bank Markazi credit facility.			

<sup>1</sup> Other payments related to this Letter of Credit are reported in Section 3.d.ii on U.S. origin Goods – Non EAR 99 Transactions – Inclusive Direct Export.

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## 11. Transactions Selected - Insufficient Evidence Available

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## 11. Transactions Selected - Insufficient Evidence Available

### Transactions Selected - Insufficient Evidence Available

- As noted in Section 1, transactions were selected for hard copy review using a range of criteria. In most cases, the transactions were selected using electronic data sources (e.g., the electronic trade data), and the information held electronically was used to locate the hard copy files.
- As also noted in Section 1, the availability of the hard copy documentation was sometimes limited, due to the age of the documents and the manner of storage over the years since the transactions occurred. In addition, some hard copy files retrieved were of poor quality and/or had little information in them.
- This category contains transactions that were selected for full hard copy review, and, having attempted to 'build' the file (as per the description in Section 1 of this Report), the hard copy available was insufficient to enable an investigator to make an assessment of the case (for instance, if only a small number of very limited negotiation files remained filed).
- In practice, this category contains transactions from SCB, Dubai only. This is because the hard copy review was only conducted in SCB, London and SCB, Dubai, and during our work in SCB, London, the combination of hard copy available and electronic trade data available was always sufficient to form a view on the transaction.
- We reviewed 707 transactions with a total value of c. \$1,851m, where the records available were insufficient to enable an investigator to make an assessment of the case.

	Volume	Value
Transactions Selected - Insufficient Evidence Available	707	\$1,851,208,855

## 12. Transactions Outside of the Review Period

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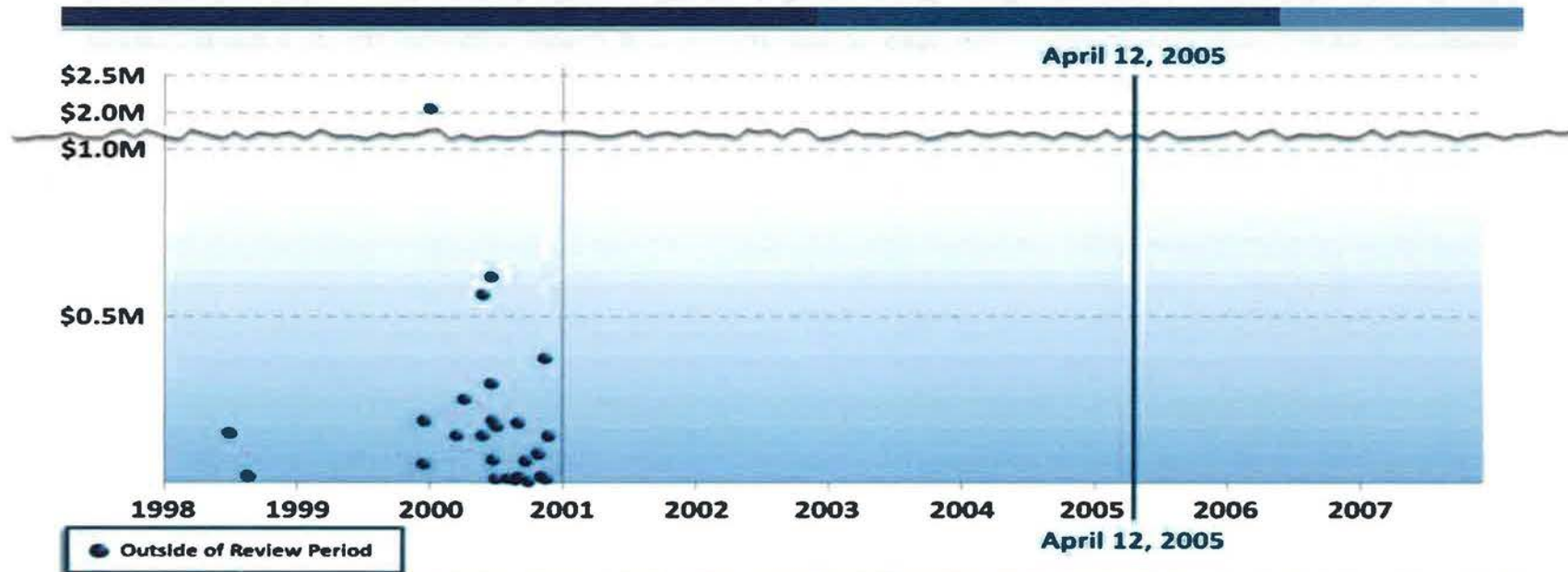
## 12. Transactions Outside of the Review Period

### Transactions Outside of the Review Period

- Promontory reviewed a number of transactions which fell outside of the scope of the Review, where the hard copy review established that a whole transaction, or some payments relating to a transaction, fell outside of the Review Period. In the interests of disclosure and transparency, further information regarding such transactions has been included in the "Transactions Outside of the Review Period" section.
- We reviewed 27 transactions, with a total value of \$6,745,481, which were outside of the Review Period.



## 12. Transactions Outside of the Review Period – Transaction Summary



Transactions Outside of the Review Period	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Mac Aviation	7	\$3,296,371	0	\$0
Jetpower	10	\$1,034,649	0	\$0
Limo Sarl	2	\$750,744	0	\$0
Monarch Aviation	3	\$404,418	0	\$0
Downtown Trading	3	\$261,288	0	\$0
Other Transactions	2	\$998,011	0	\$0
<b>Total</b>	<b>27</b>	<b>\$6,745,481</b>	<b>0</b>	<b>\$0</b>

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## 12. Transactions Outside of the Review Period - Mac Aviation - Summary

- During our work, we reviewed 7 transactions, with a total value of \$3,296,371, that involved Mac Aviation and have been classified as Transactions Outside of the Review Period.
- All these transactions followed a similar pattern (in terms of the parties involved, the flow of goods and the payments) to those transactions reported in Section 3.b. of this Report.
- For more information on Mac Aviation, please refer to Section 3.b. of this Report.

Entity Name	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Outside of Review Period – Mac Aviation	7	\$3,296,371	0	\$0

## 12. Transactions Outside of the Review Period - Jetpower Industrial - Summary

- During our work, we reviewed 10 transactions, with a total value of \$1,034,649, that involved Jetpower Industrial and have been classified as Transactions Outside of the Review Period.
- All these transactions followed a similar pattern (in terms of the parties involved, the flow of goods and the payments) to those transactions reported in Section 3.c. of this Report.
- For more information on Jetpower, please refer to Section 3.c. of this Report.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Outside of Review Period - Jetpower Industrial	10	\$1,034,649	0	\$0



## 12. Transactions Outside of the Review Period - Limo Sarl - Relationship Overview

- During our work, we reviewed 2 transactions, with a total value of \$750,744 that involved Limo Sarl and have been classified as Transactions Outside of the Review Period.
- In both cases, the shipment of goods for these transactions took place in 1999, outside of the Review Period, but the bank-to-bank refinancing of some of the negotiations involving Limo Sarl took place early in 2001, resulting in some transaction records being available for review during our work.

### Overview

- A 1997 issue of "The Iran Brief" referred to "Ms. Laleh Moein, director of Limo SARL, a company used for the clandestine procurement of military equipment, including spare parts from Israel for Iranian fighter aircraft. She also infiltrated the People's Mujahidin Organization of Iran (MEK), and was sent by SAVAMA to the group's main base in Iraq following an Iranian Air Force bombardment, to determine whether Massoud Rajavi had survived the raid".
- No other information could be found on Limo Sarl from internet search engines or third party reference resources.
- A review of internal emails indicated that Limo Sarl was not an SCB account-holding customer.

### Transaction Overview

- 2 transactions involving Limo Sarl were identified in the SCB, Dubai trade data, with a total value of \$750,744.
- Both transactions involve the shipment of U.S. origin helicopter parts to Iranian Applicant, Helicopter Services Organization. Helicopter Services Organization changed its name to Iranian Helicopter Aviation Company in 2004.
- SCB, Dubai acted as the Advising Bank on Export Letters of Credit, as well as the "Available With" Bank for both transactions. Payments for both transactions were cleared through SCB, New York, and refinanced under the "Markazi" credit facility. Funds for the transactions were ultimately remitted to Limo Sarl via an account held with Banque Scalbert Dupont.
- U.S. origin goods shipped in the transactions include various helicopter parts (including tubes, bearings, mount, tube, and lock assemblies) and engine emulsion cleaner. A review of packing lists and commercial invoices indicated the U.S. manufacturers of goods as Bell Helicopter and Turco.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Outside of Review Period - Limo Sarl	2	\$750,744	0	\$0

## 12. Transactions Outside of the Review Period - Monarch Aviation - Summary

- During our work, we reviewed 3 transactions, with a total value of \$404,418, that involved Monarch Aviation and have been classified as Transactions Outside of the Review Period.
- All these transactions followed a similar pattern (in terms of the Beneficiaries and Applicants involved, and the flow of goods) to those transactions reported in Section 3.a. of this Report.
- For more information on Monarch Aviation, please refer to Section 3.a. of this Report.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Outside of Review Period - Monarch Aviation	3	\$404,418	0	\$0

## 12. Transactions Outside of the Review Period - Downtown Trading - Summary

- During our work, we reviewed 3 transactions, with a total value of \$261,288, that involved Downtown Trading and have been classified as Transactions outside of the Review Period.
- All these transactions followed a similar pattern (in terms of the parties involved, the flow of goods and the payments) to those transactions reported in Section 3.d. of this Report.
- For more information on Downtown, please refer to Section 3.d. of this Report.

	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Transactions Outside of Review Period - Downtown Trading	3	\$261,288	0	\$0



## 12. Transactions Outside of the Review Period - Other Transactions - Summary

### Other Transactions Reviewed Outside of Review Period

- 1 transaction involved Blue Sky Aviation, an Export Letter of Credit for \$813,280, that occurred before the Review Period, prior to January 1, 2001, and did not involve U.S. origin goods.
- 1 transaction involved the shipment of U.S. origin aircraft spare parts to Iran, valued at \$184,731, by UAE entity Aircraft Components Airco AG. The shipment of goods for these transactions took place in 2000, outside of the Review Period, but the bank-to-bank refinancing of some of the negotiations took place early in 2001, resulting in some transaction records being available for review during our work.

Transactions Outside of the Review Period - Other Transactions	Volume	USD Amount	Post April 12, 2005 Volume	Post April 12, 2005 Value
Blue Sky Aviation	1	\$813,280	0	\$0
Airco	1	\$184,731	0	\$0
Total	2	\$998,011	0	\$0

## Appendices

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## Appendix 1 – Further Details on Approach

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## Appendix 1 - Further Details on Approach – Iranian Transactions Selected and Reviewed

- The total number of Tier 1 transactions reviewed as per the Tier 1 Investigative Methodology (excluding the transactions which were selected, but insufficient evidence was available), which involved Iran was 1,344.
- The total number of Tier 2 transactions reviewed as per the Tier 2 Investigative Methodology, which involved Iran was 387.

Tier 1 – Full Review as per Tier 1 Investigative Methodology - Iran Only				
	Tranche 1 - Filtered	Tranche 2 - Random	Tranche 3 - Judgmental	Total
London	38	41	17	96
Dubai	351	308	589	1,248
<b>Total</b>	<b>389</b>	<b>349</b>	<b>606</b>	<b>1,344</b>

Tier 2 – Full Review as per Tier 2 Investigative Methodology - Iran Only				
	Tranche 1 - Filtered	Tranche 2 - Random	Tranche 3 - Judgmental	Total
Singapore	15	0	302	317
Hong Kong	16	0	21	37
Japan	0	0	33	33
<b>Total</b>	<b>31</b>	<b>0</b>	<b>356</b>	<b>387</b>

## Appendix 1 - Further Details on Approach – Iranian Transactions Selected and Reviewed

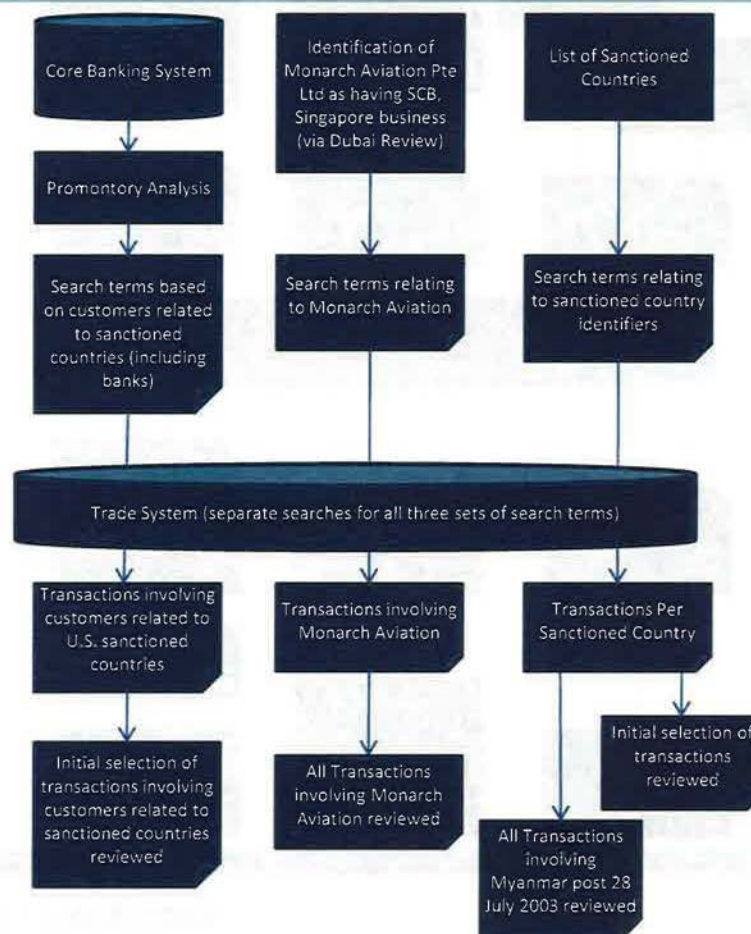
- During the Review of SCB, Dubai, 707 transactions were selected and considered, but insufficient hard copy was available to form a view.
- The total number of transactions which were selected, and all the available information retrieved as per the Tier 1 and Tier 2 Methodologies, was 2,438.

Tier 1 – Transactions Selected, Insufficient Evidence Available - Iran Only				
	Tranche 1 - Filtered	Tranche 2 - Random	Tranche 3 - Judgmental	Total
London	0	0	0	0
Dubai	97	113	497	707
<b>Tier 1 – Transactions Selected, Insufficient Evidence Available</b>	<b>97</b>	<b>113</b>	<b>497</b>	<b>707</b>
	Tranche 1 - Filtered	Tranche 2 - Random	Tranche 3 - Judgmental	Total
Tier 1 – Full Review as per Tier 1 Investigative Methodology - Iran Only (prior page)	389	349	606	1,344
Tier 1 - Transactions Selected, Insufficient Evidence Available (above)	97	113	497	707
Tier 2 – Transactions Reviewed - Iran Only (prior page)	31	0	356	387
<b>Total (Tier 1+2)</b>	<b>517</b>	<b>462</b>	<b>1,459</b>	<b>2,438</b>



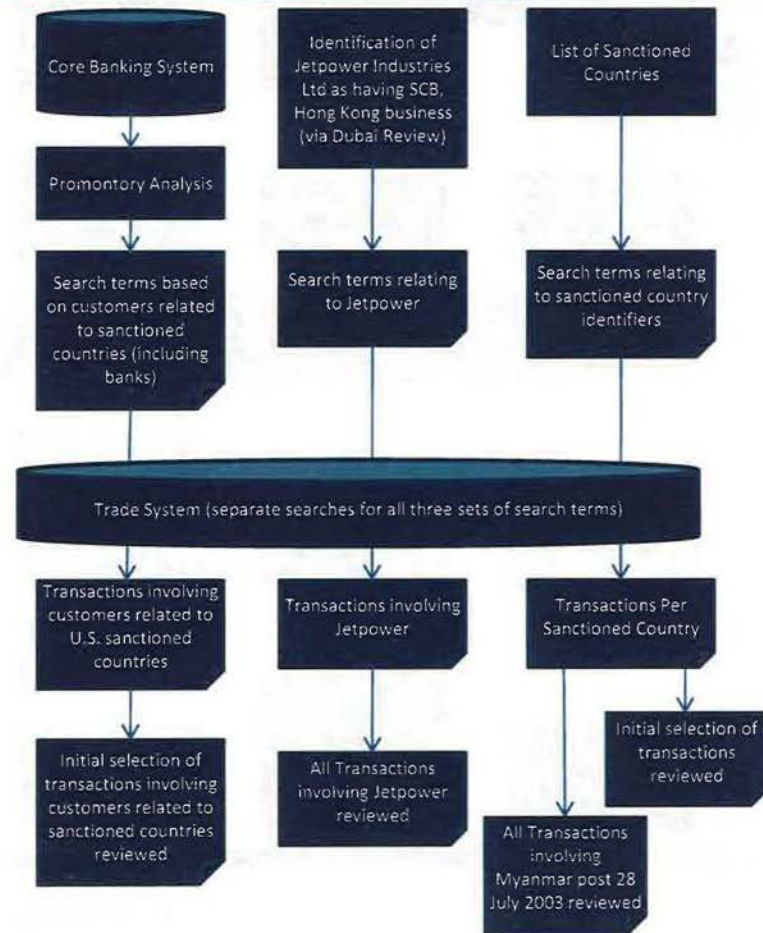
## Appendix 1 - Further Details on Approach - Tier 2 - Singapore

- Promontory's identification of transactions in scope was based on customers identified from Core Banking System searches (which had been filtered using Promontory's methodology) and names of U.S. sanctioned countries. For SCB, Singapore this resulted in two initial populations from which selections were taken:
  - Trade Finance Transactions involving a sanctioned country; and
  - Trade Finance Transactions involving customers identified from the local Core Banking System as SDNs or entities domiciled in or organized under the laws of U.S. sanctioned countries.
- The Trade Finance Transactions involving a U.S. sanctioned country were selected and the selection was reviewed.
- The Trade Finance Transactions involving customers identified from the Core Banking System searches were selected and the selection was reviewed. In practice the transactions in this selection (which included all transactions with possible contemporaneous SDN involvement) all involved Burmese SDN banks. These transactions will be reported on in our report on trade with sanctioned countries other than Iran.
- Following the initial work, two judgmental selections were taken, being all transactions involving Monarch Aviation, or involving Burma, on and after July 29, 2003, the date broadened U.S. sanctions against Burma became effective. These transactions were reviewed with a focus on the key areas pertinent to those transactions (e.g. the timing of the cash flows with regard to business with Burmese banks, and the nature of the goods and the parties involved in the Monarch Aviation transactions).
- This process is summarized in the flowchart on this page.



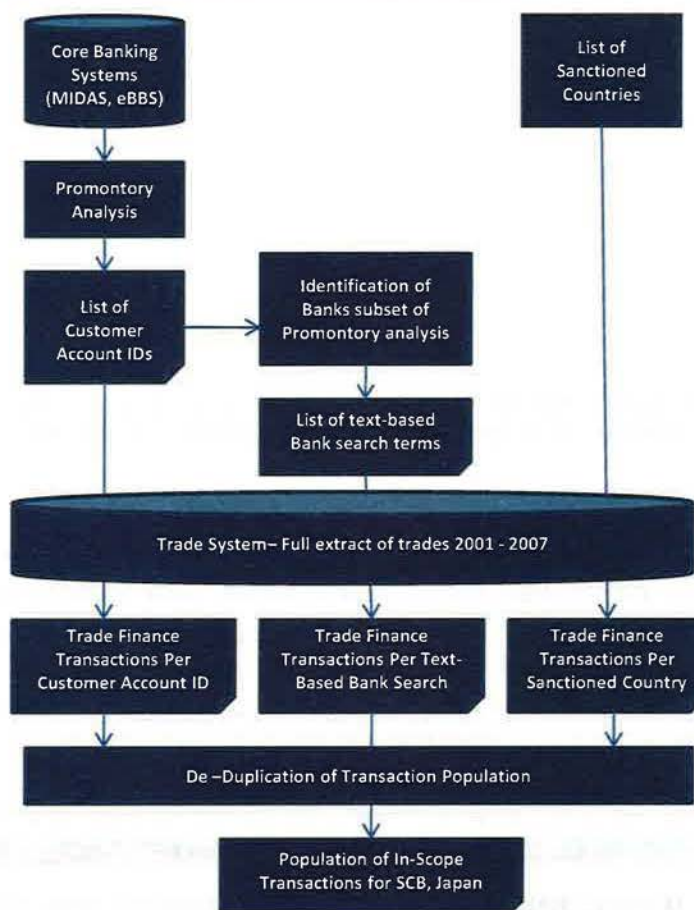
## Appendix 1 - Further Details on Approach - Tier 2 - Hong Kong

- Promontory's identification of transactions in scope was based on customers identified from Core Banking System searches (which had been filtered using Promontory's methodology) and names of U.S. sanctioned countries. For SCB, Hong Kong, this resulted in two initial populations from which selections were taken:
  - Trade Finance Transactions involving a sanctioned country; and
  - Trade Finance Transactions involving customers identified from the local Core Banking System as SDNs or entities domiciled in or organized under the laws of U.S. sanctioned countries.
- The Trade Finance Transactions involving a sanctioned country were selected and the selection reviewed.
- The Trade Finance Transactions involving customers related to sanctioned countries were selected and the selection reviewed. In practice the transactions in this selection (which included all transactions with possible contemporaneous SDN involvement) involved a Burmese SDN bank (Myanmar Foreign Trade Bank). These transactions will be reported on in our report on trade with sanctioned countries other than Iran.
- Following the initial work, two judgmental selections were taken, being all transactions involving Jetpower, or involving Burma, on and after July 29, 2003, the date broadened U.S. sanctions against Burma became effective. These transactions were reviewed with a focus on the key areas pertinent to those transactions (e.g. the timing of the cash flows with regard to business with Myanmar banks, and the nature of the goods and the parties involved in the Jetpower transactions).
- This process is summarized in the flowchart on this page.



## Appendix 1 - Further Details on Approach - Tier 2 - Japan

- Promontory's identification of transactions in scope was based on customers identified from Core Banking System searches (which had been filtered using Promontory's methodology) and names of sanctioned countries. This resulted in three transaction sets for Japan:
  - Trade Finance Transactions matching selected Customer Account IDs;
  - Trade Finance Transactions matching a term in the list of text-based Bank search terms<sup>1</sup>; and
  - Trade Finance Transactions involving a sanctioned country.<sup>2</sup>
- The three transactions sets were then reconciled and de-duplicated to establish the population of in-scope transactions per country.
- This process is summarized in the flowchart on this page.



<sup>1</sup>The list of text-based Bank search terms included terms related to the customers identified from the Core Banking System searches (e.g. ("Refah") for Bank Refah Kargaran), and the addresses of those customers.

<sup>2</sup> The involvement of a sanctioned country was identified through the use of country identifier codes for the sanctioned countries in scope, and/or the use of the name of a sanctioned country.

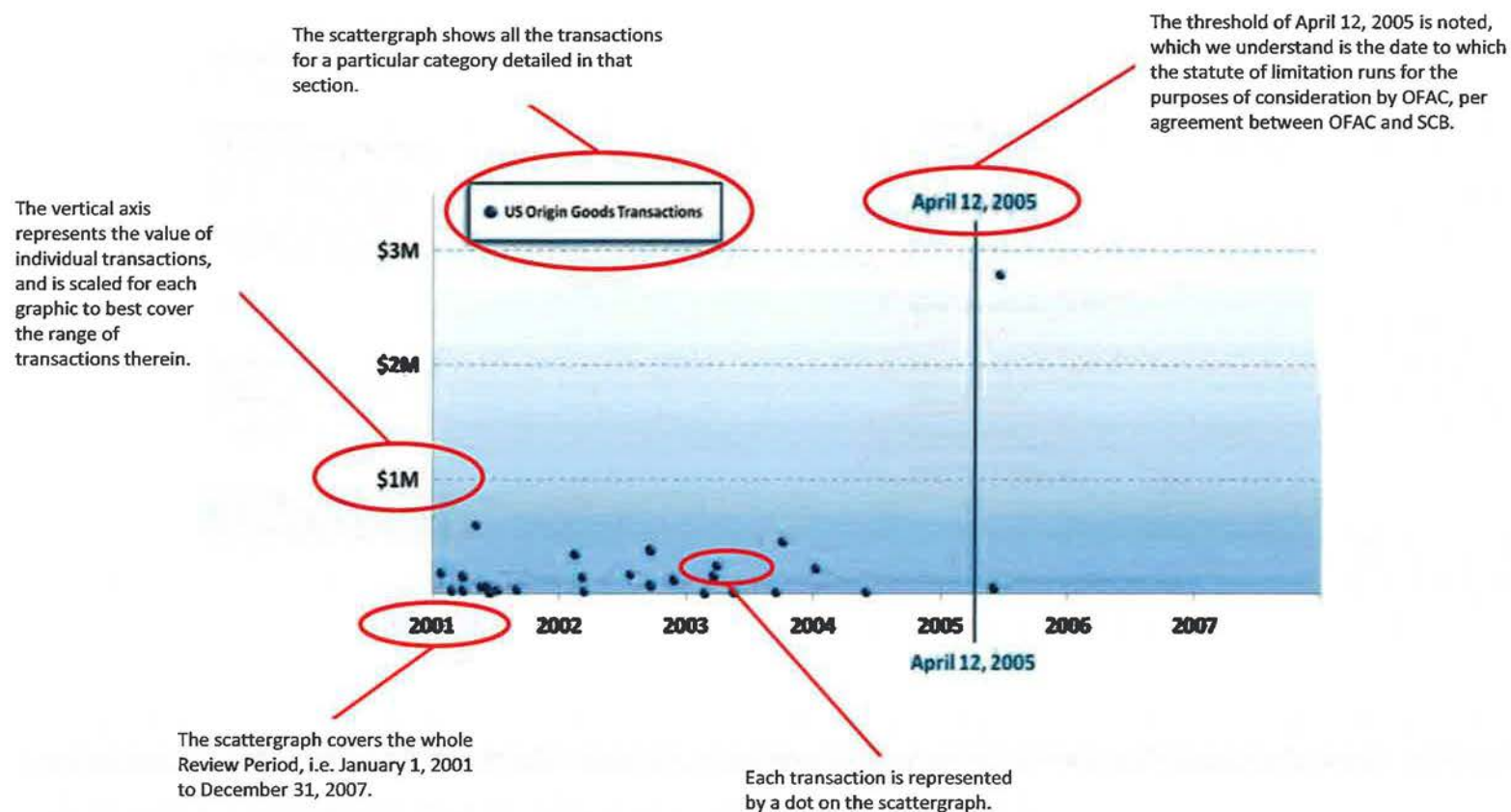


## Appendix 1 - Further Details on Approach - Additional Investigative Measures Undertaken

- In addition to the Review methodology executed for the transactions in Tier 1 and Tier 2, a number of additional sources of information were reviewed for subsets of these transactions.
- These sources of information were obtained subsequent to the initial review of some of the transactions pertaining to that party, and were reviewed in order to deepen our understanding around that transaction set. The types of information requested were driven by the nature of the case and consequent potential relevance of the additional information. They included:
  - The original Know Your Customer file for one or more of the parties involved in the transaction;
  - The account statements for one or more of the parties involved in a transaction, where those parties were a banking customer of SCB in that office;
  - Records relating to other business the Bank may have undertaken with a party involved in a transaction, such as credit approval files; and
  - SWIFT messages from SCB, New York during the Review Period.
- In addition to the sources detailed above, Promontory consulted with SCB's external counsel regarding the parallel work being undertaken to review documents and emails pertaining to the same business, which on many occasions served to inform our work on identifying and understanding specific transactions.

## Appendix 1 - Further Details on Approach - Reporting of Findings

- Our Report makes extensive use of "scattergraphs" to convey the timing and value of different transactions in the same set. This is explained below.



## Appendix 1 - Further Details on Approach - Reporting of Findings

- For individual transactions, or example transactions in a larger, consistent transaction set, this Report includes a detailed transaction table. This is explained below:

As noted above, in some cases the value of the U.S. origin goods will equal that of the whole transaction, but in other cases there are some non-U.S. origin goods which mean the sum will be less than the Total Payments.

The threshold of April 12, 2005 is noted, which we understand is the date to which the statute of limitation runs for the purposes of consideration by OFAC, per agreement between OFAC and SCB.

The payment status indicates that the Review saw evidence of the final settlement of the payment (e.g., through a MT940 message or other proof).

Each transaction was assessed for the likelihood of inclusion in EAR 99.

The details of the Certificate of Origin were noted and, where applicable, a scanned copy of pertinent details was included next to the table.

The goods description on the Letter of Credit (or similar document) was recorded. Note that in some cases this was a broad category – where further information on other documents was informative, this was captured in the "Other Details" Section.

Program:	Product Type:
LC Amount:	Post April 12, 2005:
Payments for U.S. Goods:	Payment Status:
U.S. Persons:	Total Payments:
Description:	Certificate of Origin:
EAR99 Item:	Goods Description:
Shell Company Involvement:	Consistent with Line of Business:
Agent, Affiliate, or Subsidiary of Iranian Entity:	Trading Company:
Other Details:	Other Possible U.S. Connection:

Other Details covers any other information considered pertinent, such as listings of individual parts in a shipment of goods.

The parties involved (the Beneficiary in particular) were reviewed to assess if they were a legitimate company or possibly, a shell company. The factors considered included whether the entity had a dedicated website and whether the entity's address used in the documents was found to have been shared with other entities.

Notes when one of the entities involved in the transaction is a trading company involved in the general import and export of goods with a range of parties.

The goods and the nature of the transaction were considered against our understanding of the parties' normal line of business.

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## Appendix 2 – Transactions Post April 12, 2005

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## Appendix 2 - Transactions Post April 12, 2005

U.S. Nexus Transactions, No Potential License or Exemption	Volume	Value
Transactions Involving Contemporaneous SDNs	0	\$0
Transactions Involving Non-EAR 99 U.S. Origin Goods	2	\$3,390,000
Transactions Involving a U.S. Person Other Than a Bank	18	\$1,864,536
Transactions That did not Appear to Follow Applicable U-turn Routing	0	\$0
<b>Total of U.S. Nexus Transactions, No Potential License or Exemption</b>	<b>20</b>	<b>\$5,254,536</b>
Other Transactions	Volume	Value
Transactions That Appeared to Follow Applicable U-turn Routing	308	\$574,632,231
Transactions With No U.S. Nexus	164	\$84,059,953
U.S. Nexus Transactions, Potential License or Exemption	0	\$0
Transactions Involving EAR 99 U.S. Origin Goods – Inconclusive Direct Export	27	\$28,581,949
Transactions With Some Evidence of U.S. Origin Goods	6	\$34,796,139
<b>Total of Other Transactions<sup>1</sup></b>	<b>505</b>	<b>\$722,070,272</b>
<b>Total of U.S. Nexus Transactions, No Potential License or Exemption and Other Transactions<sup>1</sup></b>	<b>525</b>	<b>\$727,324,808</b>

<sup>1</sup> Excluding 'Transactions Selected, Insufficient Evidence Available' for which insufficient data is available to split the transaction pre- and post-April 12, 2005

## **Appendix 3 – Use of KYC checklists in SCB, Dubai**

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## Appendix 3 - Use of KYC checklists in SCB, Dubai

- During our Review of hard copy files in SCB, Dubai, several instances of KYC and sanctions checklists were noted.
- A detailed review of the completeness and accuracy of the use of such checklists was not within the scope of our Review, but we noted that the use of such checklists was not consistent across different files (i.e., evidence of the checklists was not always there, and when it was there, it had not always been completed).
- From the transactions selected for hard copy review in SCB, Dubai, we noted the following threshold dates:
  - December 14, 1995: the earliest issuing date of an Export Letter of Credit in our hard copy review identified as having transactions with sanctions checklists in their respective hard copy files;
  - March 6, 2001: the date documents were received for the earliest transaction within the Review Period which had a completed KYC checklist; and
  - May 22, 2006: the earliest date for a transaction with a completed sanctions stamp.

**Checklist**

Standard Chartered  
CO: Y 555555  
EXPORT BILLS UNDER LC - CHECKLIST

DATE: 14/12/95  
TIME: 14:00  
BY: [Signature]

NO.	DESCRIPTION	DATE	TIME	BY
1	Check for KYC			
2	Check for KYC			
3	Check for KYC			
4	Check for KYC			
5	Check for KYC			
6	Check for KYC			
7	Check for KYC			
8	Check for KYC			
9	Check for KYC			
10	Check for KYC			
11	Check for KYC			
12	Check for KYC			
13	Check for KYC			
14	Check for KYC			
15	Check for KYC			
16	Check for KYC			
17	Check for KYC			
18	Check for KYC			
19	Check for KYC			
20	Check for KYC			

1. Refer to KYC if you answer any of the above as NO  
2. Encourage use of our Standard Form

**Sanctions Stamp**

**CHECK COMPLETED**

AML	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
OFAC	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
RESTRICTED COUNTRIES	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
IRAN	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

**EXI**

## Appendix 4 – Calculation of Estimated Total Populations

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## Appendix 4 - Estimated Total Business With U.S. Sanctioned Countries: 2001-2007

- Estimates of the total business involving U.S. sanctioned countries, and specifically for Iranian business, varied depending on the basis of the estimate.
- The methodology for the estimates provided here is detailed at the end of the section. The estimates are based on the electronic trade data. Although the data has been "linked" for SCB, Dubai, the largest population, it is still very likely that the totals are overestimates, as the trade systems provide records of associated activities in a trade finance transaction as individual items, and recourse to the full population of hard copy documents would be required to gain assurance that all transactions were properly linked.
- Another estimate can be derived by reference to the Trade Approval System ("TAS"). Based on TAS, the number of trade transactions for all U.S. sanctioned countries (i.e. Tier 1 and Tier 2, excluding India) is estimated to be 11,054 and number of transactions with Iran 10,465. However, TAS is an approval system, used for informational and risk monitoring purposes, rather than to provide aggregated data. It appears to have recorded smaller (less than \$1m) trade activities with a tenor of one year or less, and was used for monitoring and approving bank risk only (i.e. transactions involving bank counterparties) and did not capture information relating to business with corporate and other non-bank entities.
- The table below details the estimate of trade transactions involving all U.S. sanctioned countries.

Country	USD		Other Currencies		Estimated Total	
	No.	Value	No.	USD Equivalent Value	Total No.	Total Value
UK	2,144	\$15,900,606,548	347	\$1,338,677,633	2,491	\$17,239,284,181
UAE	23,668	\$9,818,996,501	3,865	\$2,230,461,117	27,533	\$12,049,457,618
Singapore	1,581	\$3,932,438,287	73	\$8,613,994	1,654	\$3,941,052,281
Hong Kong	1,264	\$1,564,782,751	128	\$301,231,203	1,392	\$1,866,013,954
Japan	441	\$201,084,283	389	\$152,170,133	830	\$353,254,416
Total	29,098	\$31,417,908,370	4,802	\$4,031,154,080	33,900	\$35,449,062,450



## Appendix 4 - Estimated Total Business With Iran : 2001-2007

- The table below details the estimate of trade transactions involving Iran.

Country	USD		Other Currencies		Estimated Total	
	No.	Value	No.	USD Equivalent Value	Total No.	Total Value
UK	958	\$6,769,720,512	247	\$1,264,350,044	1,205	\$8,034,070,556
UAE	20,196	\$8,876,748,987	3,053	\$1,405,761,567	23,249	\$10,282,510,554
Singapore	835	\$2,075,201,683	22	\$6,661,039	857	\$2,081,862,722
Hong Kong	1,146	\$1,556,135,916	118	\$298,640,952	1,264	\$1,854,776,868
Japan	375	\$192,852,590	256	\$110,913,813	631	\$303,766,403
Total	23,510	\$19,470,659,688	3,696	\$3,086,327,415	27,206	\$22,556,987,103

## Appendix 4 - Estimated Total Business - Methodology for Estimate

### Dubai

The methodology used to calculate the summary for SCB, Dubai was as follows:

- All fields in the trade data extracts were searched for the names of the U.S. sanctioned countries. A number of variations of the country name were searched in various instances.
- A review of hit terms was conducted to remove all "false positives", i.e., database query hits for identified transactions which did not involve trade with a U.S. sanctioned country. "Trade with a sanctioned country" was deemed to be an instance in which at least one of the following two conditions was met:
  - One or more of the involved entities, e.g., a customer, a corresponding bank, etc., was physically located in a U.S. sanctioned country; and/or
  - The transaction involved goods originally from a sanctioned country, e.g., Myanmar hardwood log, even if no entity in the transaction was located in the sanctioned country, e.g., Myanmar.
- Related transactions were then linked to create a picture of the trade finance transaction where Letter of Credit transactions were treated as the "parent". The "parent" Letters of Credit were linked to Negotiations, Collections and Refinances by matching the parent Letter of Credit identifier within these records.
- The currency value of the parent Letter of Credit was taken as the value of the transaction.
- Guarantees were counted separately with the currency value taken as the value of the Guarantee.
- Value data were not available for a small percentage of transactions. These transactions were included in sum counts despite having no associated value.
- The average exchange rate during the entire Review Period obtained from [www.oanda.com](http://www.oanda.com) and used to convert currency to the USD value.

## Appendix 4 - Estimated Total Business - Methodology for Estimate

### London:

The methodology used to estimate the total trade business with U.S. sanctioned countries at SCB, London was as follows:

1. Raw data were extracted from Tradewinds 2001 to 2003 and TC Imex 2003 to 2007 and converted to .xls format.
2. The data were extracted using the following logic: Transactions booked during 2001 to 2007 broken down by:
  - Country code
  - Product code
  - Currency code.
3. The summaries were then prepared according to steps 1-6 outlined for SCB, Hong Kong and SCB, Singapore.

### Hong Kong and Singapore:

The methodology used to estimate the total trade business with U.S. sanctioned countries at SCB, Hong Kong and SCB, Singapore was as follows:

1. Extracts were taken from the relevant MF Imex system, containing all transactions which included a country identifier code. The extract was uploaded to an MS Excel sheet and formatted.
2. All fields in the MS Excel sheets were searched for the sanctioned countries. The relevant country columns were filtered by sanctioned country code.
3. For each sanctioned country, the relevant date column was filtered to establish the time frame.
4. The currency value of the transactions were taken as the value of the deal.
5. The total value for every currency per year per sanctioned country was then calculated using MS Excel summation.
6. The average exchange rate during the entire Review Period obtained from [www.oanda.com](http://www.oanda.com) was used to convert non-USD currency value to the USD value.
7. Please note, unlike the methodology used for Dubai, related transactions were not linked to create a picture of the trade deal where Letter of Credit transactions were treated as the "parent." This could, therefore, have resulted in double-counting.



## Appendix 4 - Estimated Total Business - Methodology for Estimate

### Japan:

The methodology used to estimate the total trade business with U.S. sanctioned countries at SCB, Japan is as follows:

- A complete data set of Japan Exim Bills was retrieved by the Exim Bills System Support Team.
  1. Data retrieved covered the entire Review Period.
  2. Data contained all transactions for all clients regardless of geography and country of incorporation.
  3. Due to the volume of the data, these files were received in three batches.
  4. Each batch was further broken down by Trade Product Code.
  5. Using file structure details received, the raw data were delimited into a spreadsheet format (.xls).
  6. This was delivered in three separate spreadsheets with separate tabs for each Trade Product Code.
- The interrogation methodology used is as follows:
  1. For each Trade Product Type, data were interrogated for country codes appertaining to the U.S. sanctioned countries.
  2. This provided a data set of trade transactions by Trade Product Code for all U.S. sanctioned countries within the requisite timescales for all currencies.
  3. Searches were done for individual U.S. sanctioned countries to produce new tabs within the spreadsheets for individual countries.
  4. For each individual country, further new tabs were created to produce a single tab for a specific country and currency, i.e., Iran USD and Iraq DEM.
  5. The individual tabs were finally collated by the year in which the transactions were initiated providing a targeted set of spreadsheets of Transaction Type by Country and Currency.
- The summary was then prepared according to steps 2-6 outlined for Hong Kong and Singapore.

## **Appendix 5 – Country-Specific Findings for Tier 2 Countries**

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## Appendix 5 - Country-Specific Findings for Tier 2 Countries

### Overview

- The transactions selected for SCB, Singapore, SCB, Hong Kong and SCB, Japan were reviewed in line with the Tier 2 Investigative Methodology, as detailed in Section 1 of this Report.
- With the exception of transactions relating to Monarch Aviation in Singapore, and transactions relating to Jetpower in Hong Kong, which are detailed in this Report, none of the transactions involving Iran had a U.S. nexus without a potential license or exemption.
- The results of the Review, excluding the findings related to Monarch Aviation and Jetpower, are detailed below.

### SCB, Singapore

- 15 transactions involving Iranian business were reviewed of which 10 had a U.S. nexus (appearing to be U.S. cleared) and, on the evidence available, appeared to follow u-turn routing.
- None of the transactions involved a contemporaneous SDN, and all involved non-contemporaneous SDNs, all being Iranian banks.

### SCB, Hong Kong

- 11 transactions involving Iranian business were reviewed, of which 6 had a U.S. nexus (appearing to be U.S. cleared) and, on the evidence available, appeared to follow u-turn routing.
- None of the transactions involved a contemporaneous SDN, and 4 involved non-contemporaneous SDNs which were Iranian banks.

### SCB, Japan

- 33 transactions involving Iranian business were reviewed, of which 19 had a U.S. nexus (appearing to be U.S. cleared) and, on the evidence available, appeared to follow u-turn routing.
- None of the transactions involved a contemporaneous SDN, and 15 involved non-contemporaneous SDNs which were Iranian banks.